

Transcript of the Testimony of
SABRINA RIVERO-CANCHOLA

Date: December 20, 2023

Case: WESTMORELAND VS. DART

TOOMEY REPORTING

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SABRINA RIVERO-CANCHOLA

December 20, 2023

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EUGENE WESTMORELAND,)	
individually and for)	
a, class)	
)	
Plaintiff,)	
)	
vs.)	No. 1:23-cv-01851
)	
THOMAS DART, Sheriff of)	Part 1
Cook County and COOK)	
COUNTY, ILLINOIS,)	
)	
Defendants.)	

This is Part 1 of the deposition of
SABRINA RIVERO-CANCHOLA, called by the
Plaintiff for examination, taken via Zoom
videoconferencing, taken pursuant to the
Federal Rules of Civil Procedure for the United
States District Courts pertaining to the taking
of depositions, taken before PEGGY A. ANDERSON,
a Certified Shorthand Reporter of the State of
Illinois, on December 20, 2023, at 10:00 a.m.

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2 (Pages 2 to 5)

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 THE LAW OFFICES OF:</p> <p>4 THOMAS G. MORRISSEY, LTD.</p> <p>5 BY: MR. PATRICK W. MORRISSEY</p> <p>6 10257 South Western Avenue</p> <p>7 Chicago, Illinois 60643</p> <p>8 (773) 233-7900</p> <p>9 pwm@morrisseylawchicago.com</p> <p>10 Appeared on behalf of the</p> <p>11 Plaintiff;</p> <p>12</p> <p>13 THE LAW OFFICES OF:</p> <p>14 DEVORE RADUNSKY, LLC</p> <p>15 BY: MR. JASON E. DEVORE</p> <p>16 230 West Monroe Street</p> <p>17 Suite 230</p> <p>18 Chicago, Illinois 60606</p> <p>19 (312) 300-4479</p> <p>20 jdevore@devoreradunsky.com</p> <p>21</p> <p>22 Appeared on behalf of the</p> <p>23 Defendant, Cook County.</p> <p>24</p>	<p style="text-align: right;">Page 4</p> <p>1 (WHEREUPON, the witness</p> <p>2 was first duly sworn.)</p> <p>3 MR. MORRISSEY: This is the</p> <p>4 deposition in Westmoreland versus Dart</p> <p>5 taken pursuant to notice and continued to</p> <p>6 this date.</p> <p>7 WHEREUPON:</p> <p>8 SABRINA RIVERO-CANCHOLA,</p> <p>9 called as a witness herein, having been first</p> <p>10 duly sworn, was examined and testified as</p> <p>11 follows:</p> <p>12 DIRECT EXAMINATION</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Ma'am, could you please state your</p> <p>15 name?</p> <p>16 A Sabrina Rivero-Canchola.</p> <p>17 Q And what is your title at the</p> <p>18 Sheriff's Office?</p> <p>19 A ADA compliance officer.</p> <p>20 Q How long have you been the ADA</p> <p>21 compliance officer?</p> <p>22 A Since approximately September of</p> <p>23 2015.</p> <p>24 Q What are your responsibilities</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 WITNESS PAGE</p> <p>3</p> <p>4 SABRINA RIVERO-CANCHOLA</p> <p>5</p> <p>6 DIRECT EXAMINATION BY</p> <p>7 MR. MORRISSEY: 4</p> <p>8</p> <p>9 EXHIBITS</p> <p>10 MARKED PAGE</p> <p>11 PLAINTIFF'S EXHIBIT NO. 17 70</p> <p>12 PLAINTIFF'S EXHIBIT NO. 23 151</p> <p>13 PLAINTIFF'S EXHIBIT NO. 25 17</p> <p>14 PLAINTIFF'S EXHIBIT NO. 26 10</p> <p>15 PLAINTIFF'S EXHIBIT NO. 28 93</p> <p>16 PLAINTIFF'S EXHIBIT NO. 29 118</p> <p>17 PLAINTIFF'S EXHIBIT NO. 30 91</p> <p>18 PLAINTIFF'S EXHIBIT NO. 37 26</p> <p>19 PLAINTIFF'S EXHIBIT NO. 38 133</p> <p>20 PLAINTIFF'S EXHIBIT NO. 42 76</p> <p>21</p> <p>22 *****</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 5</p> <p>1 presently as the ADA compliance officer?</p> <p>2 A To ensure that the Cook County's</p> <p>3 Sheriff's Office complies with the American's</p> <p>4 with Disabilities Act and all that entails.</p> <p>5 Q And has that been your role during</p> <p>6 the entire time you have been the ADA</p> <p>7 compliance officer?</p> <p>8 A Yes.</p> <p>9 Q What documents did you look at to</p> <p>10 prepare for testifying today?</p> <p>11 A I reviewed some e-mails. I reviewed</p> <p>12 the request to admit that were submitted to the</p> <p>13 Sheriff's Office and Cook County in this case.</p> <p>14 I think that's it. That's all I can recall in</p> <p>15 this moment.</p> <p>16 Q Did you review any videos in</p> <p>17 preparation for your testimony?</p> <p>18 A No.</p> <p>19 Q How many e-mails did you review in</p> <p>20 preparation for testifying?</p> <p>21 A I didn't count them. I don't know.</p> <p>22 Q Do you have an approximate number of</p> <p>23 e-mails you looked at?</p> <p>24 A No, I didn't count them.</p>

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3 (Pages 6 to 9)

<p style="text-align: right;">Page 6</p> <p>1 Q Do you recall what any of the e-mails 2 discussed?</p> <p>3 A The e-mails were e-mails that had 4 been tendered in this case between Eric Davis, 5 TJ Tyrrell and possibly a couple of other 6 people.</p> <p>7 Q Did you meet with counsel to prepare 8 for your testimony today?</p> <p>9 A I did.</p> <p>10 Q How many times?</p> <p>11 A Once.</p> <p>12 Q Approximately how long did you meet 13 to prepare?</p> <p>14 A Approximately an hour or two.</p> <p>15 Q In preparation for your deposition 16 today, did you review any of your prior 17 deposition testimony?</p> <p>18 A No.</p> <p>19 Q Have you ever met Eugene Westmoreland?</p> <p>20 A I have.</p> <p>21 Q How many times?</p> <p>22 A I don't know how many times.</p> <p>23 Definitely more than once.</p> <p>24 Q Do you recall any of your</p>	<p style="text-align: right;">Page 8</p> <p>1 Q And what do you base that off of?</p> <p>2 A His alerts.</p> <p>3 Q When he entered the jail, did he have 4 any alerts?</p> <p>5 A I believe he had a number of alerts, 6 just like every other inmate.</p> <p>7 Q Do you know whether he had any alerts 8 for a cane, crutch, walker or wheelchair when 9 he first entered the Cook County Jail?</p> <p>10 A He may have had one or more alerts 11 for accessibility devices or mobility devices 12 such as those that you listed.</p> <p>13 Q Do you know where Mr. Westmoreland 14 was housed when he initially entered the Cook 15 County Jail?</p> <p>16 A I don't know his initial housing, no.</p> <p>17 Q Do you know what division he was in?</p> <p>18 A I don't know his initial housing, no.</p> <p>19 Q Now, back in 2019, did you receive 20 regular e-mails about people who were 21 downgraded in the RTU and were eligible to be 22 moved to other divisions?</p> <p>23 A I don't know what you mean by regular 24 e-mails but, on occasion, I have received</p>
<p style="text-align: right;">Page 7</p> <p>1 conversations with Mr. Westmoreland?</p> <p>2 A I recall the general topics of my 3 conversations with Mr. Westmoreland, yes.</p> <p>4 Q Have you taken any notes regarding 5 your conversations with Mr. Westmoreland?</p> <p>6 A No.</p> <p>7 Q What general topics do you recall 8 regarding conversations with Mr. Westmoreland?</p> <p>9 A Those would be the topics covered in 10 his grievances.</p> <p>11 Q Which grievances?</p> <p>12 A His ADA grievances.</p> <p>13 Q When Mr. Westmoreland would have been 14 in the Cook County Jail, did he use a 15 wheelchair?</p> <p>16 A He did.</p> <p>17 Q Do you know why he used a wheelchair?</p> <p>18 A I'm not privy to his medical 19 information, no.</p> <p>20 Q When Mr. Westmoreland entered the 21 Cook County Jail, was he able to walk?</p> <p>22 A I'm not sure. I believe that he 23 didn't have a wheelchair immediately when he 24 entered the Cook County Jail.</p>	<p style="text-align: right;">Page 9</p> <p>1 e-mails about people who have been downgraded, 2 yes.</p> <p>3 Q And why would you receive those 4 e-mails about people who were downgraded?</p> <p>5 A Because I work with Cermak as a 6 partner in bed control in our medical 7 buildings.</p> <p>8 Q What do you mean by "bed control"?</p> <p>9 A Bed control, maximizing the amount of 10 space that we have in our accessible divisions 11 or medical buildings to ensure that the inmates 12 that are housed there are the ones that need to 13 be housed there based on their care level.</p> <p>14 Q What do you mean by "their care 15 level"?</p> <p>16 A The medical alerts assigned to them 17 by Cermak.</p> <p>18 Q And what are the accessible 19 divisions, Ms. Rivero-Canchola?</p> <p>20 A I believe that's a question of law.</p> <p>21 Q Do you have any understanding of the 22 accessible divisions at the Cook County Jail?</p> <p>23 MR. DEVORE: Objection as to form 24 regarding what the definition of accessible</p>

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4 (Pages 10 to 13)

<p style="text-align: right;">Page 10</p> <p>1 is.</p> <p>2 BY THE WITNESS:</p> <p>3 A I think that would depend on what</p> <p>4 accessibility provision is being applied at</p> <p>5 that time.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q Did you ever make a statement that</p> <p>8 the only ADA housing, housing that complies</p> <p>9 with 2010 design standards that currently exist</p> <p>10 for detainees with mobility impairments, is the</p> <p>11 RTU and Cermak?</p> <p>12 A I don't know. I may have. Are you</p> <p>13 reading from a document that you would like me</p> <p>14 to review?</p> <p>15 Q Sure. I will show you Exhibit 26,</p> <p>16 which is an ADA Assessment and Improvements:</p> <p>17 Division 2, 4, 6, 9 and 10 that's dated</p> <p>18 4/3/2018 that was prepared by you.</p> <p>19 Do you see this document, Ms. Rivero,</p> <p>20 the first page, the 2019 business case, that's</p> <p>21 dated 4/3/2018?</p> <p>22 A That's what --</p> <p>23 MR. DEVORE: Can you make it bigger?</p> <p>24</p>	<p style="text-align: right;">Page 12</p> <p>1 this context?</p> <p>2 A Well, I believe the document speaks</p> <p>3 for itself, but as it says in the document, the</p> <p>4 only ADA housing and, in parentheses, meaning</p> <p>5 the housing that complies with 2010 design</p> <p>6 standards that currently exist for detainees</p> <p>7 with mobility impairments is the RTU and</p> <p>8 Cermak. So I believe that document speaks for</p> <p>9 itself as to what it pertains to.</p> <p>10 MR. DEVORE: Pat, can you show us</p> <p>11 what Bates numbers these are in this case,</p> <p>12 this exhibit?</p> <p>13 MR. MORRISSEY: I sent them to you</p> <p>14 before the dep. I don't think this is --</p> <p>15 it says 18- -- it was produced in this case</p> <p>16 by my office, but I think this was produced</p> <p>17 by the Sheriff in another case.</p> <p>18 MR. DEVORE: Okay.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q To your understanding</p> <p>21 Ms. Rivero-Canchola, what is your understanding</p> <p>22 of ADA compliant housing?</p> <p>23 A With regard to what?</p> <p>24 Q I'm just asking in general. Do you</p>
<p style="text-align: right;">Page 11</p> <p>1 BY THE WITNESS:</p> <p>2 A -- the Bates stamp says.</p> <p>3 THE WITNESS: Sorry, Jason.</p> <p>4 MR. DEVORE: No, I was seeing if you</p> <p>5 could make it a little bit bigger, Pat.</p> <p>6 MR. MORRISSEY: Sure.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Do you see that, Ms. Rivero-Canchola?</p> <p>9 A I can see it, yes.</p> <p>10 Q I'm showing you part of the first</p> <p>11 page. Does it refresh your memory about</p> <p>12 preparing this business case?</p> <p>13 A It looks like something that was</p> <p>14 prepared by me in conjunction with Scot</p> <p>15 Achterhof, yes.</p> <p>16 Q If I go down to the second page, do</p> <p>17 you see it says: Background. And I'm zooming</p> <p>18 it here, second page here. And perhaps the</p> <p>19 third sentence says: The only ADA housing --</p> <p>20 and I read that a few minutes ago.</p> <p>21 Do you see that?</p> <p>22 A Yes. You read that in part a few</p> <p>23 minutes ago.</p> <p>24 Q What do you mean by "ADA housing" in</p>	<p style="text-align: right;">Page 13</p> <p>1 have any understanding of what ADA compliant</p> <p>2 housing means?</p> <p>3 MR. DEVORE: Objection, vague.</p> <p>4 BY THE WITNESS:</p> <p>5 A Your question is very vague. ADA</p> <p>6 compliant housing depends on the particular</p> <p>7 housing that we're talking about and the</p> <p>8 particular applicable standard for that time.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q I will provide a little context in</p> <p>11 the exhibit that's on the screen. You say:</p> <p>12 Division 10 is a maximum security division with</p> <p>13 no ADA compliant housing.</p> <p>14 Did I read that correct?</p> <p>15 A You read that in part. Again, the</p> <p>16 document speaks for itself. It says: The only</p> <p>17 ADA housing, and in parentheses, housing that</p> <p>18 complies with 2010 design standards. So when</p> <p>19 drafting this document, we were referring to</p> <p>20 current standards, not the standards at the</p> <p>21 time when the divisions were built.</p> <p>22 Q And when you say "we," who are you</p> <p>23 referring to?</p> <p>24 A I'm referring to myself and the</p>

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5 (Pages 14 to 17)

<p style="text-align: right;">Page 14</p> <p>1 person who assisted in drafting that, which was</p> <p>2 Scot Achterhof.</p> <p>3 Q Now, Ms. Rivero-Canchola, are you</p> <p>4 able to prepare a list of people who use</p> <p>5 wheelchairs that are currently housed in the</p> <p>6 RTU?</p> <p>7 A Am I able to prepare a list? What do</p> <p>8 you mean by "able"?</p> <p>9 Q Well, can you generate a list of</p> <p>10 people who are housed in the RTU that have a</p> <p>11 wheelchair alert?</p> <p>12 A Off of memory, no.</p> <p>13 Q Using the Sheriff's computer system,</p> <p>14 can you generate a mobility aid list</p> <p>15 identifying people who use a wheelchair that</p> <p>16 are housed in the RTU?</p> <p>17 A What do you mean by "Sheriff's</p> <p>18 computer system"?</p> <p>19 Q When I say the computer system, I'm</p> <p>20 talking about CCOMS?</p> <p>21 A You said the Sheriff's computer</p> <p>22 system. So you're referring to CCOMS, the Cook</p> <p>23 County Offender Management System?</p> <p>24 Q Correct.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q Who is Collin McArdle?</p> <p>2 A He's a lieutenant.</p> <p>3 Q In what building?</p> <p>4 A In the Cook County Sheriff's Office.</p> <p>5 Q Is he in the RTU?</p> <p>6 A I believe he's currently assigned to</p> <p>7 the RTU.</p> <p>8 Q Who is Roxane, R-o-x-a-n-e,</p> <p>9 B-o-u-t-t-e?</p> <p>10 A Roxane Boutte is a superintendant at</p> <p>11 the Cook County Sheriff's Office.</p> <p>12 Q Of what division?</p> <p>13 A For what time period, Patrick?</p> <p>14 Q How about right now.</p> <p>15 A Division 6.</p> <p>16 Q How about in 2011 -- 2021? Excuse</p> <p>17 me.</p> <p>18 A I don't know where she was in 2021.</p> <p>19 Q Has she ever been the superintendent</p> <p>20 of RTU?</p> <p>21 A I think so.</p> <p>22 Q Have you ever discussed with either</p> <p>23 Collin McArdle or Roxane Boutte a list of all</p> <p>24 inmates who are allowed to keep their devices</p>
<p style="text-align: right;">Page 15</p> <p>1 A A computer program that is leased to</p> <p>2 us, that's what you are referring to, not the</p> <p>3 Sheriff's computer system.</p> <p>4 Q So with that clarification, can you</p> <p>5 answer the question, please?</p> <p>6 A The Cook County Offender Management</p> <p>7 System can generate a report of wheelchair</p> <p>8 detainees.</p> <p>9 Q And how do you do that?</p> <p>10 A I don't know. I don't do it.</p> <p>11 Q Have you ever requested that report?</p> <p>12 A Requested what report?</p> <p>13 Q CCOMS, have you ever requested that</p> <p>14 somebody from the Sheriff's Office run a report</p> <p>15 to identify people who have a wheelchair alert</p> <p>16 at the Cook County Jail?</p> <p>17 A No, I have never requested anyone at</p> <p>18 the Sheriff's Office run a report of wheelchair</p> <p>19 detainees to my knowledge.</p> <p>20 Q How about a report about people who</p> <p>21 are in the RTU with a walker, cane, crutches or</p> <p>22 a wheelchair?</p> <p>23 A I don't recall requesting any reports</p> <p>24 of anyone in the RTU with those devices.</p>	<p style="text-align: right;">Page 17</p> <p>1 on the tier?</p> <p>2 MR. DEVORE: Objection as to time --</p> <p>3 or vague as to time.</p> <p>4 BY THE WITNESS:</p> <p>5 A Possibly.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q What do you remember about that?</p> <p>8 A I don't know. Is there a document</p> <p>9 you would like to show me to refresh my</p> <p>10 recollection? I send a lot of e-mails to those</p> <p>11 people.</p> <p>12 Q Why would you send a lot of e-mails</p> <p>13 to those people?</p> <p>14 A Because they're my coworkers.</p> <p>15 Q All right. I'll show you Exhibit 25,</p> <p>16 which is an e-mail from you titled: Mobility</p> <p>17 Aid List that was sent on May 7th, 2021.</p> <p>18 Ms. Rivero-Canchola, do you see the</p> <p>19 e-mail that you wrote on May 7th, 2021, the</p> <p>20 first half of the first page that the top of</p> <p>21 the page says: Mobility aid list?</p> <p>22 A I do see an e-mail that appears to be</p> <p>23 from me in May of 2021, yes.</p> <p>24 Q Does this refresh your memory about</p>

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6 (Pages 18 to 21)

<p style="text-align: right;">Page 18</p> <p>1 talking to either of those individuals about a</p> <p>2 list of inmates who are allowed to keep their</p> <p>3 devices on the tier?</p> <p>4 A About talking to them, no, but it</p> <p>5 does appear to display that I've sent an e-mail</p> <p>6 to them entitled Mobility Aid List regarding a</p> <p>7 list of inmates who are allowed to keep devices</p> <p>8 on their tier.</p> <p>9 Q What is a mobility aid list?</p> <p>10 A It's the list that appears on the</p> <p>11 screen that you're showing me.</p> <p>12 Q And how did you obtain this list?</p> <p>13 A This is a generated report from</p> <p>14 CCOMS.</p> <p>15 Q Who generated this report?</p> <p>16 A I don't recall.</p> <p>17 Q Can you generate a report like this</p> <p>18 from CCOMS?</p> <p>19 MR. DEVORE: Objection, asked and</p> <p>20 answered.</p> <p>21 BY THE WITNESS:</p> <p>22 A I don't recall.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Anything refresh your memory whether</p>	<p style="text-align: right;">Page 20</p> <p>1 on this one page.</p> <p>2 Q Have you ever generated a report from</p> <p>3 CCOMS identifying people who are wheelchair</p> <p>4 long distance only?</p> <p>5 A I may have at some point. I don't</p> <p>6 recall.</p> <p>7 Q And why would you have generated a</p> <p>8 wheelchair long distance only report from</p> <p>9 CCOMS?</p> <p>10 A Well, if I don't recall if I did that</p> <p>11 or not, then I would not be able to recall the</p> <p>12 reason I would do that.</p> <p>13 Q And how can you generate a list of</p> <p>14 wheelchair long distance only alerts using</p> <p>15 CCOMS?</p> <p>16 A I think your question answered the</p> <p>17 question. You would generate it through CCOMS.</p> <p>18 It's a computer-aided program that generates</p> <p>19 reports.</p> <p>20 Q I'm going to stop sharing my screen.</p> <p>21 When a wheelchair user enters the jail, do you</p> <p>22 meet with that detainee?</p> <p>23 A Usually, depending on the time</p> <p>24 period.</p>
<p style="text-align: right;">Page 19</p> <p>1 you have the ability to generate a report from</p> <p>2 CCOMS listing people who have a cane, crutch,</p> <p>3 wheelchair or walker?</p> <p>4 A I think, as we've already covered,</p> <p>5 this e-mail lists those individuals. So at</p> <p>6 that time, yes, I was able to provide that</p> <p>7 list.</p> <p>8 Q Can you presently generate this type</p> <p>9 of list for people in the RTU?</p> <p>10 A I'm not sure. I haven't tried.</p> <p>11 Q On the first page of this list, it</p> <p>12 has Eugene Westmoreland, and it has wheelchair</p> <p>13 and there is an entry below and it says: Walker.</p> <p>14 Do you see that, Ms. Rivero-Canchola?</p> <p>15 A I do see that.</p> <p>16 Q Can you explain to me why there would</p> <p>17 be two devices listed for Mr. Westmoreland?</p> <p>18 A I cannot.</p> <p>19 Q Does this list that I'm showing you,</p> <p>20 does it identify people who are wheelchair long</p> <p>21 distance only?</p> <p>22 A This partial list that you're showing</p> <p>23 me on the screen, this one page, I don't see</p> <p>24 anyone that says wheelchair long distance only</p>	<p style="text-align: right;">Page 21</p> <p>1 Q What do you mean?</p> <p>2 A Meaning during COVID, we tried to not</p> <p>3 have unnecessary interactions to prevent the</p> <p>4 spread of COVID-19.</p> <p>5 Q How about now, do you meet with the</p> <p>6 person?</p> <p>7 A I do.</p> <p>8 Q How soon after the person is admitted</p> <p>9 to the jail do you generally meet with the</p> <p>10 detainee?</p> <p>11 A It depends on when they're admitted.</p> <p>12 Q Why does that matter?</p> <p>13 A Because if they're admitted on a day</p> <p>14 where I may not be here or on a weekend when I</p> <p>15 may not be here, then that time period would</p> <p>16 vary on when they're -- if they're admitted on</p> <p>17 a Monday and I'm at work or present the next</p> <p>18 day, which is Tuesday.</p> <p>19 Q Is it your practice to meet with new</p> <p>20 inmates who use wheelchairs within the first</p> <p>21 week of their admission?</p> <p>22 A Usually, yes.</p> <p>23 Q When you meet with these people, do</p> <p>24 you generate any notes?</p>

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7 (Pages 22 to 25)

<p style="text-align: right;">Page 22</p> <p>1 A No.</p> <p>2 Q Do you keep a folder for the people</p> <p>3 who use wheelchairs that are incarcerated at</p> <p>4 the Cook County Jail?</p> <p>5 A No.</p> <p>6 Q Why not?</p> <p>7 A Why would I have to? That's not</p> <p>8 something that I do in the scope of my</p> <p>9 employment.</p> <p>10 Q Have you ever heard of the term ADA</p> <p>11 accommodation plan?</p> <p>12 THE REPORTER: I'm sorry, Pat. ADA</p> <p>13 what?</p> <p>14 MR. MORRISSEY: ADA accommodation</p> <p>15 plan.</p> <p>16 BY THE WITNESS:</p> <p>17 A Yes. I've heard of that term.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q What is your understanding of the ADA</p> <p>20 accommodation plan at the Cook County</p> <p>21 Department of Corrections?</p> <p>22 A I don't understand your question.</p> <p>23 Q What is your understanding of the ADA</p> <p>24 accommodation plan?</p>	<p style="text-align: right;">Page 24</p> <p>1 serve as a liaison between a disabled</p> <p>2 individual and the Cook County Department of</p> <p>3 Corrections?</p> <p>4 MR. DEVORE: Objection, form and all</p> <p>5 the prior objections that were just noted.</p> <p>6 BY THE WITNESS:</p> <p>7 A Okay. I don't understand what you</p> <p>8 mean by liaison. But my job as ADA compliance</p> <p>9 officer is to work with all the branches of</p> <p>10 Cook County and making sure that we are</p> <p>11 complying with the needs of the disabled</p> <p>12 population within our custody.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Do you train newly hired correctional</p> <p>15 officers or probationary officers?</p> <p>16 A I train newly hired correctional</p> <p>17 officers, yes.</p> <p>18 MR. DEVORE: And just to be clear, we</p> <p>19 are talking about right now or at any time,</p> <p>20 Pat?</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Right now, right? Is that what you</p> <p>23 do, Ms. Rivero-Canchola?</p> <p>24 A Yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 MR. DEVORE: Objection is form. It's</p> <p>2 unclear what time frame.</p> <p>3 BY THE WITNESS:</p> <p>4 A Yeah, I don't understand what you're</p> <p>5 asking. The phrase ADA accommodation plan can</p> <p>6 vary depending on the context in which it's</p> <p>7 used.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q As the ADA compliance officer, do you</p> <p>10 serve as a liaison between disabled individuals</p> <p>11 and the special needs committee?</p> <p>12 A The special needs committee?</p> <p>13 Q Right.</p> <p>14 A I don't know what that is.</p> <p>15 Q As the ADA compliance officer, do you</p> <p>16 serve as a liaison between a disabled</p> <p>17 individual and Capital Planning?</p> <p>18 A I'm not sure what you mean by</p> <p>19 "liaison" in that context. Disabled inmates</p> <p>20 have no role when it comes to Capital Planning.</p> <p>21 Capital Planning has no role when it comes to</p> <p>22 disabled inmates within the Department of</p> <p>23 Corrections.</p> <p>24 Q As the ADA compliance officer, do you</p>	<p style="text-align: right;">Page 25</p> <p>1 Q And you have done that since 2015?</p> <p>2 A Yes.</p> <p>3 Q And you provide -- walk me through</p> <p>4 the training you provide to the newly hired</p> <p>5 correctional officers?</p> <p>6 A Well, I think training was tendered</p> <p>7 in this case, but I have a PowerPoint training</p> <p>8 that I display on the screen while I provide</p> <p>9 supplemental information to what's on the</p> <p>10 screen to the class that's before me.</p> <p>11 Q Do you provide handouts to the people</p> <p>12 who are taking your class?</p> <p>13 A No.</p> <p>14 Q When was the last time you updated</p> <p>15 that PowerPoint?</p> <p>16 A I don't know.</p> <p>17 Q Have you updated it since 2015?</p> <p>18 A It's been updated since 2015.</p> <p>19 Q How many times?</p> <p>20 A More than once.</p> <p>21 Q What parts of your PowerPoint have</p> <p>22 you updated?</p> <p>23 A I don't recall the specific portions</p> <p>24 that were updated and when they were updated.</p>

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8 (Pages 26 to 29)

<p style="text-align: right;">Page 26</p> <p>1 Q At the end of your PowerPoint, do you</p> <p>2 still have a -- do you still -- do you have</p> <p>3 questions to the participants?</p> <p>4 A Give questions to participants? Like</p> <p>5 do I ask them quiz questions that are at the</p> <p>6 end of the PowerPoint that you have in this</p> <p>7 case?</p> <p>8 Q Correct.</p> <p>9 A Yes, I do.</p> <p>10 Q And the PowerPoint that's been</p> <p>11 produced in this case, is that your current</p> <p>12 PowerPoint?</p> <p>13 A I don't know which version was</p> <p>14 produced in this case, so I don't know.</p> <p>15 MR. DEVORE: Perhaps you could show</p> <p>16 it to her if you want her to confirm and</p> <p>17 she can address it.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q I can show Exhibit 37 is your</p> <p>20 PowerPoint. Ms. Rivero-Canchola, do you see</p> <p>21 Exhibit 37 it says: Americans with</p> <p>22 Disabilities Act?</p> <p>23 A I see the first page.</p> <p>24 Q Is this the first page of your</p>	<p style="text-align: right;">Page 28</p> <p>1 provided to newly hired correctional officers?</p> <p>2 MR. DEVORE: Objection, assumes facts</p> <p>3 not in evidence.</p> <p>4 BY THE WITNESS:</p> <p>5 A Your question assumes only an hour is</p> <p>6 provided, and I cannot tell you why the hour</p> <p>7 that you believe is provided would only be</p> <p>8 provided, no.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q Well, how many hours of ADA training</p> <p>11 are provided to newly hired correctional</p> <p>12 officers?</p> <p>13 A It depends on what type of training</p> <p>14 you're talking about.</p> <p>15 Q Tell me the types of training you're</p> <p>16 aware of.</p> <p>17 A I'm aware of the in-person training</p> <p>18 that they receive, which is two hours, not one</p> <p>19 hour. They also receive online learning</p> <p>20 management training on the ADA. I don't know</p> <p>21 how long that takes. I think it's based on the</p> <p>22 individual that's taking it.</p> <p>23 Q And what is that online version</p> <p>24 called?</p>
<p style="text-align: right;">Page 27</p> <p>1 current PowerPoint?</p> <p>2 A I believe so but I'm not entirely</p> <p>3 sure.</p> <p>4 Q Second one says your name and your</p> <p>5 title and your e-mail address. Is this the</p> <p>6 second page of your current PowerPoint?</p> <p>7 A That's my name, my title and the CCSO</p> <p>8 general ADA e-mail address in the past, not the</p> <p>9 current one.</p> <p>10 Q So in looking at Exhibit 37, would</p> <p>11 you agree that this is a prior version of your</p> <p>12 PowerPoint?</p> <p>13 A You mean looking at Page 1 and 2 that</p> <p>14 you showed me?</p> <p>15 Q Right.</p> <p>16 A I would say Page 1 and 2 looks like a</p> <p>17 prior version, yes.</p> <p>18 Q Do you have access to your present</p> <p>19 version?</p> <p>20 A Do I have access to my present what?</p> <p>21 Q Version of the PowerPoint?</p> <p>22 A I do.</p> <p>23 Q I'm going to stop sharing. Can you</p> <p>24 tell me why only one hour of ADA training is</p>	<p style="text-align: right;">Page 29</p> <p>1 A I don't know what it's called. It's</p> <p>2 just an ADA training.</p> <p>3 Q And how do you access that ADA</p> <p>4 training?</p> <p>5 A It's in the online learning</p> <p>6 management system that we have.</p> <p>7 Q Did you create that online learning</p> <p>8 management training?</p> <p>9 A I helped to create it with the</p> <p>10 research and training department, yes.</p> <p>11 Q Are there videos on that online</p> <p>12 learning training?</p> <p>13 A Are there videos? I don't believe</p> <p>14 so, no.</p> <p>15 Q Are there handouts associated with</p> <p>16 the online learning training?</p> <p>17 A I don't understand your question.</p> <p>18 How can an online learning training give you a</p> <p>19 handout?</p> <p>20 Q Well, is there information a</p> <p>21 participant can download regarding the online</p> <p>22 training?</p> <p>23 A I don't know.</p> <p>24 Q Are staff required to take the online</p>

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9 (Pages 30 to 33)

<p style="text-align: right;">Page 30</p> <p>1 learning training relating to ADA every year?</p> <p>2 A They are required to take it. I</p> <p>3 don't know how often.</p> <p>4 Q Has the online learning training been</p> <p>5 updated over the last three years?</p> <p>6 A It may have. I don't know.</p> <p>7 Q What does the online learning</p> <p>8 training discuss regarding moving inmates up</p> <p>9 and down ramps?</p> <p>10 A The online learning management</p> <p>11 training reflects the similar content that is</p> <p>12 provided in my classroom training.</p> <p>13 Q All right. Provide that training.</p> <p>14 Tell me what the training says regarding moving</p> <p>15 detainees and wheelchairs up and down ramps.</p> <p>16 A Well, I don't have it before me, so I</p> <p>17 can't give it to you word for word, Patrick,</p> <p>18 but it's in accordance with our policy and,</p> <p>19 again, with the training that we give our</p> <p>20 correctional officers in person.</p> <p>21 Q Can you explain the training you give</p> <p>22 regarding moving mobility-impaired inmates up</p> <p>23 and down ramps?</p> <p>24 A I can give you a general overview,</p>	<p style="text-align: right;">Page 32</p> <p>1 barriers, Ms. Rivero-Canchola.</p> <p>2 A Okay.</p> <p>3 Q What is your understanding of a</p> <p>4 structural barrier?</p> <p>5 A I think that's context specific,</p> <p>6 right? It would depend on the situation.</p> <p>7 Q Have you ever given examples to staff</p> <p>8 about structural barriers where staff members</p> <p>9 should assist a wheelchair user to overcome</p> <p>10 them?</p> <p>11 A Yeah, I probably have.</p> <p>12 Q Can you give me the context to the</p> <p>13 training you provided regarding this issue?</p> <p>14 A You mean like generally because I</p> <p>15 can't give you a word-for-word training that I</p> <p>16 have provided in the past.</p> <p>17 Q Sure. That's fine.</p> <p>18 A Okay. Well, as I already stated, the</p> <p>19 general training that I give is that it's the</p> <p>20 policy of the Sheriff's Office to assist</p> <p>21 disabled inmates to overcome any barriers</p> <p>22 including those structurally, and those</p> <p>23 barriers could vary from one situation to the</p> <p>24 next.</p>
<p style="text-align: right;">Page 31</p> <p>1 not a word for word what's in the training, no.</p> <p>2 Q Please provide your general overview?</p> <p>3 A The general overview is that we</p> <p>4 assist inmates that are in wheelchairs to</p> <p>5 overcome any structural barriers that are in</p> <p>6 our facility.</p> <p>7 THE WITNESS: Jason, can I take a</p> <p>8 second just to tell these people in the</p> <p>9 hall they're being too loud?</p> <p>10 MR. DEVORE: Yes. Perhaps we can</p> <p>11 take a, yeah, two-minute break.</p> <p>12 THE WITNESS: I don't even need two</p> <p>13 minutes. I just need to tell them to quiet</p> <p>14 down and I will leave my mic on, but</p> <p>15 they're too loud.</p> <p>16 MR. DEVORE: Okay.</p> <p>17 THE WITNESS: Okay. Sorry.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Why do you -- why does the Sheriff's</p> <p>20 Office train staff to help wheelchair users to</p> <p>21 overcome structural barriers?</p> <p>22 A Because that's the heart of the ADA</p> <p>23 is to assist people with disabilities.</p> <p>24 Q But I want to focus on structural</p>	<p style="text-align: right;">Page 33</p> <p>1 Q To your knowledge, are there any</p> <p>2 structural barriers pertaining to ramps at the</p> <p>3 Cook County Jail?</p> <p>4 A It depends on what you mean by that.</p> <p>5 Q Well, have you ever given training to</p> <p>6 staff about which ramps at the Cook County Jail</p> <p>7 present a structural barrier that they must</p> <p>8 help a wheelchair user overcome?</p> <p>9 A My training doesn't focus on</p> <p>10 individual ramps, no.</p> <p>11 Q Why not?</p> <p>12 A Because as I already stated, my</p> <p>13 training focuses on the general idea which is</p> <p>14 that we comply with the ADA by assisting</p> <p>15 disabled inmates that are in our custody to</p> <p>16 overcome any barriers, including structural</p> <p>17 ones. I don't focus on specific areas of</p> <p>18 buildings.</p> <p>19 Q Do you provide training to the staff</p> <p>20 how to assist people with canes to move up and</p> <p>21 down ramps?</p> <p>22 A I don't understand your question.</p> <p>23 Q Does your training that you train</p> <p>24 people on -- strike that.</p>

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10 (Pages 34 to 37)

<p style="text-align: right;">Page 34</p> <p>1 Does your training discuss helping</p> <p>2 people who use a cane, crutch or walker move up</p> <p>3 or down ramps?</p> <p>4 A I mean, you have my training,</p> <p>5 Patrick. So I'm not sure if it mentions</p> <p>6 specifically cane, crutch, walker, people</p> <p>7 moving up and down ramps. I don't know if it</p> <p>8 contains that language.</p> <p>9 Q Tell me how you would expect</p> <p>10 Sheriff's employees to help somebody with a</p> <p>11 cane, crutch or walker overcome structural</p> <p>12 barriers that are presented by a ramp at the</p> <p>13 Cook County Jail?</p> <p>14 MR. DEVORE: Objection, vague as to</p> <p>15 what and where the ramp is.</p> <p>16 BY THE WITNESS:</p> <p>17 A Yeah, I'm not sure I understand your</p> <p>18 question. Like I already stated, it's context</p> <p>19 specific, right? So you're providing me with</p> <p>20 an incomplete hypothetical that I can't answer.</p> <p>21 BY MR. MORRISSEY:</p> <p>22 Q Well, can you tell me how it's</p> <p>23 context specific?</p> <p>24 A Well, it would depend on that</p>	<p style="text-align: right;">Page 36</p> <p>1 Q And why did you stop doing that?</p> <p>2 A Because the nature of how they have</p> <p>3 court here at Cook County has changed.</p> <p>4 Q And how has it changed?</p> <p>5 A Most inmates appear on Zoom.</p> <p>6 Q Do some disabled inmates attend court</p> <p>7 in person to your knowledge?</p> <p>8 A I don't know what -- how you're</p> <p>9 defining disabled in this context, but we do</p> <p>10 have inmates with disabilities that attend</p> <p>11 court at Cook County, yes.</p> <p>12 Q And if a detainee with a mobility</p> <p>13 disability attends court, is staff at the Cook</p> <p>14 County Department of Corrections notified that</p> <p>15 they need to accommodate the person when they</p> <p>16 attend court?</p> <p>17 A I don't understand your question.</p> <p>18 MR. DEVORE: Objection as to -- yeah,</p> <p>19 objection as to form. It's unclear if</p> <p>20 you're talking about all detainees or just</p> <p>21 disability -- detainees with certain</p> <p>22 disability.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q In preparation for your deposition,</p>
<p style="text-align: right;">Page 35</p> <p>1 person's abilities, the possible device that</p> <p>2 they may have, the situation that they're in,</p> <p>3 the structure that they're encountering, the</p> <p>4 staff members that are present at the time.</p> <p>5 All of the factors would be relevant.</p> <p>6 Q Do you keep a list of people who are</p> <p>7 moved from the Cook County Jail that go to</p> <p>8 court?</p> <p>9 A Do I keep a list of people that are</p> <p>10 moved from Cook County Jail to court, no.</p> <p>11 Q Do you send e-mails on a daily basis</p> <p>12 when a disabled person has a regularly</p> <p>13 scheduled court appearance?</p> <p>14 A Not generally anymore, no.</p> <p>15 Q Did you used to?</p> <p>16 A I used to sometime ago, yes.</p> <p>17 Q And why did you used to keep that</p> <p>18 list sometime ago?</p> <p>19 A I think you just changed the context</p> <p>20 of your question. You asked me if I used to</p> <p>21 send an e-mail regarding inmates that go to</p> <p>22 court and if I keep a list. I used to send</p> <p>23 e-mails, notifications to court, when certain</p> <p>24 people would come over, yes.</p>	<p style="text-align: right;">Page 37</p> <p>1 Ms. Rivero-Canchola, did you see an e-mail that</p> <p>2 you sent out a few years ago identifying some</p> <p>3 mobility-impaired detainees were going to</p> <p>4 attend court on a certain day?</p> <p>5 A No, I don't believe in preparation</p> <p>6 for my deposition we reviewed any e-mails about</p> <p>7 people going to court.</p> <p>8 Q Did you used to keep -- send e-mails</p> <p>9 called an ADA movement list for each weekday?</p> <p>10 A Did I title any e-mails ADA movement</p> <p>11 list?</p> <p>12 Q Right.</p> <p>13 A I don't think I did, no, not that I</p> <p>14 recall.</p> <p>15 Q Did you ever receive e-mails titled</p> <p>16 ADA movement list by staff?</p> <p>17 A I mean, in nine and a half years,</p> <p>18 maybe. I don't know. Is there something that</p> <p>19 you would like to show me, Patrick, that you</p> <p>20 would like me to look at?</p> <p>21 Q So prior to COVID, there used to be</p> <p>22 e-mails identifying wheelchair users who were</p> <p>23 attending court at Leighton; is that fair to</p> <p>24 say?</p>

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11 (Pages 38 to 41)

<p style="text-align: right;">Page 38</p> <p>1 A Prior to COVID, there used to be 2 e-mails regarding inmates in wheelchairs that 3 attended multiple courthouses, not just 4 Leighton. 5 Q And presently, that doesn't happen 6 because most people attend court on Zoom; is 7 that fair to say? 8 A Presently, I do not notify them by 9 e-mail that they are coming, yes. 10 Q Why don't you do it presently? 11 A I thought I already answered that 12 question. 13 MR. DEVORE: Yeah. 14 BY THE WITNESS: 15 A And the answer was the nature of how 16 inmates attend court has changed since COVID. 17 BY MR. MORRISSEY: 18 Q Prior to COVID, did you notify Cook 19 County Department of Corrections staff that a 20 wheelchair user was going to attend Cermak, a 21 medical appointment at Cermak on a specific 22 date? 23 A Can you rephrase that question? 24 Q Prior to COVID, did you ever send a</p>	<p style="text-align: right;">Page 40</p> <p>1 document that you showed us a part of. 2 Q And why did you request Capital 3 Planning to conduct an ADA assessment of the 4 entire Cook County Jail campus? 5 A Why did I request that? Because I 6 wanted them to conduct an ADA assessment of the 7 entire campus. 8 Q Is there a reason why you made that 9 request? 10 A Yes, because I wanted them to conduct 11 an assessment of the entire campus. I don't 12 understand your question. 13 Q And does that include ramps in the 14 RTU? 15 A It includes the entire campus, as you 16 stated. 17 Q Why did you ask them to conduct an 18 assessment of the RTU ramps? 19 MR. DEVORE: Objection, asked and 20 answered and objection as to form and 21 assuming facts not in evidence. 22 BY THE WITNESS: 23 A Yeah, as I already stated, I asked 24 them to conduct that assessment because I</p>
<p style="text-align: right;">Page 39</p> <p>1 notification to staff members that a wheelchair 2 user would have an appointment at Cermak on a 3 specific date? 4 A Not that I recall, no. 5 Q Why before COVID would you send an 6 e-mail notifying a wheelchair user had court on 7 a specific day, but you wouldn't identify the 8 wheelchair user had a medical appointment at 9 Cermak? 10 A I'm going to do my best to answer 11 this paragraph of text that you just spit out 12 at me, Patrick. 13 I think as you're aware, in the past, 14 we used to send notifications to court services 15 about wheelchair detainees that were coming 16 into their custody to put them on notice in 17 case those detainees may need an accommodation 18 while they're in their facility. 19 Q Now, have you requested Capital 20 Planning to conduct an ADA assessment into the 21 Cook County Department of Corrections? 22 A I believe I did. 23 Q And when did you do that? 24 A I believe the date is on that</p>	<p style="text-align: right;">Page 41</p> <p>1 wanted them to conduct an assessment of the 2 entire campus, not any specific feature of any 3 specific building but the entire campus. 4 Q And, to your knowledge, have 5 architects reviewed or assessed any parts of 6 the jail campus based on your request? 7 A To my knowledge, that process is 8 ongoing. 9 Q Can you tell me your understanding of 10 the process and how it's ongoing? 11 A My understanding is that Capital 12 Planning has begun the process of undergoing an 13 assessment of the entire campus. 14 Q And to your knowledge, have any parts 15 of the campus been reviewed by an architect? 16 A I don't know what you mean by 17 reviewed by an architect. 18 Q Well, over the last six months or a 19 year, have any architects come to the Cook 20 County Jail campus to conduct ADA assessments? 21 A Yes. Some have come to the Cook 22 County Jail campus for various reasons, yes. 23 Q Who has come to the Cook County Jail? 24 A I don't know all of who has come to</p>

TOOMEY REPORTING

312-853-0648

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12 (Pages 42 to 45)

<p style="text-align: right;">Page 42</p> <p>1 the Cook County Jail, Patrick. I know that</p> <p>2 Globetrotters has been at the Cook County Jail</p> <p>3 at various states. I'm sure other contractors</p> <p>4 have been here. It's a big place. We have a</p> <p>5 lot of work.</p> <p>6 Q What parts of the jail have these</p> <p>7 architects reviewed to your knowledge?</p> <p>8 A I don't know all the parts of the</p> <p>9 jail the architects have reviewed.</p> <p>10 Q Do you know any of the parts?</p> <p>11 A Well, I do know that I requested all</p> <p>12 of the campus to be reviewed. So like I said,</p> <p>13 that process is ongoing.</p> <p>14 Q The question is do you have any</p> <p>15 personal knowledge whether architects have</p> <p>16 reviewed any parts of the Cook County Jail?</p> <p>17 MR. DEVORE: Objection as to form.</p> <p>18 Review versus inspect, I just want to make</p> <p>19 a clear line of demarkation.</p> <p>20 BY THE WITNESS:</p> <p>21 A Yeah, I'm not sure what you mean by</p> <p>22 reviewed, and I'm not sure what the process is</p> <p>23 when architects are conducting an ADA</p> <p>24 assessment. I know that, as I have already</p>	<p style="text-align: right;">Page 44</p> <p>1 hired to do.</p> <p>2 Q Was Globetrotters just hired to look</p> <p>3 at Cermak?</p> <p>4 A I don't know. I don't know what the</p> <p>5 terms of their contract -- their employment</p> <p>6 contract is. I don't know.</p> <p>7 Q And how many people from</p> <p>8 Globetrotters were present when you escorted</p> <p>9 them to Cermak?</p> <p>10 A That number varied.</p> <p>11 Q Based on what?</p> <p>12 A Based on the day that they visited.</p> <p>13 Q Why did they come to Cermak on more</p> <p>14 than one occasion to your knowledge?</p> <p>15 A Because they requested to.</p> <p>16 Q Did they tell you why they wanted to</p> <p>17 come to Cermak more than one time?</p> <p>18 A I didn't ask them why they needed to</p> <p>19 come more than once, so no.</p> <p>20 Q When they came, did they bring tools</p> <p>21 to measure the ramp?</p> <p>22 A I mean, yeah, they had some tools</p> <p>23 with them, yes.</p> <p>24 Q And what did they have?</p>
<p style="text-align: right;">Page 43</p> <p>1 stated, architects have visited the Cook County</p> <p>2 Jail campus. What they have done during their</p> <p>3 time here, I don't know the specific details,</p> <p>4 no.</p> <p>5 Q Well, how do you know Globetrotters</p> <p>6 has come to the Cook County Jail?</p> <p>7 A Because I have been present when they</p> <p>8 have visited.</p> <p>9 Q And when did they visit?</p> <p>10 A Various dates on -- during this year.</p> <p>11 I'm not sure of the specific dates.</p> <p>12 Q And were you present on multiple</p> <p>13 times when Globetrotters was at the Cook County</p> <p>14 Jail?</p> <p>15 A I was present for part of it, yes.</p> <p>16 Q And what part were you present for?</p> <p>17 A I was present for their escort</p> <p>18 through parts of Cermak.</p> <p>19 Q And what parts of the Cook County</p> <p>20 Jail did Globetrotters spend time looking at?</p> <p>21 A I just stated I was present for their</p> <p>22 visit to Cermak.</p> <p>23 Q And what did they do at Cermak?</p> <p>24 A An assessment, like what they were</p>	<p style="text-align: right;">Page 45</p> <p>1 A I don't know. I didn't ask them what</p> <p>2 their tools are or what their specific purpose</p> <p>3 was.</p> <p>4 Q Did they have to have permission from</p> <p>5 the DOC to bring these tools into Cermak?</p> <p>6 A They get permission through Capital</p> <p>7 Planning.</p> <p>8 Q And does Capital Planning have to ask</p> <p>9 the Sheriff's Office for permission for them to</p> <p>10 bring this equipment in?</p> <p>11 A I don't know Capital Planning's</p> <p>12 process for obtaining access letters, so I</p> <p>13 don't know.</p> <p>14 Q Was anyone from Capital Planning</p> <p>15 present when you escorted Globetrotters to the</p> <p>16 Cermak ramp?</p> <p>17 A Your question just assumed that I</p> <p>18 escorted Globetrotters to the Cermak ramp. We</p> <p>19 haven't discussed that.</p> <p>20 Q Where did you escort Globetrotters?</p> <p>21 A As I already stated, I was present</p> <p>22 when they inspected Cermak.</p> <p>23 Q And where in Cermak did they inspect?</p> <p>24 A The entire building.</p>

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13 (Pages 46 to 49)

<p style="text-align: right;">Page 46</p> <p>1 Q And does that include the Cermak 2 ramp?</p> <p>3 A It includes the entire building. So, 4 yes, it would include the ramp.</p> <p>5 Q And when they measured the ramp, did 6 they have a laser?</p> <p>7 A Are you assuming that they measured 8 the ramp because I didn't say that.</p> <p>9 Q Did they measure the ramp?</p> <p>10 A They inspected the ramp.</p> <p>11 Q Tell me how they inspected the ramp 12 based on your observation?</p> <p>13 A My job was to provide escort, not to 14 take notes or question what they were doing. 15 So I was just present while they were there 16 looking at the ramp. So you would have to ask 17 them. I don't know.</p> <p>18 Q Did they make any statements to you 19 regarding the handrails on that ramp?</p> <p>20 A They did not.</p> <p>21 Q Did they make any statements to you 22 about the rise of the ramp?</p> <p>23 A They did not.</p> <p>24 Q Did you review -- strike that.</p>	<p style="text-align: right;">Page 48</p> <p>1 that document on the screen, requested an ADA 2 assessment of the Cook County Department of 3 Corrections campus. So that would include all 4 of the buildings that are on the Cook County 5 Department of Corrections campus. 6 (WHEREUPON, Mr. Morrissey 7 experienced technical 8 difficulties.)</p> <p>9 MR. DEVORE: Pat, are you having some 10 technical difficulties over there?</p> <p>11 THE REPORTER: We'll be off the 12 record, right?</p> <p>13 MR. DEVORE: Yeah, maybe we should 14 take a -- since there is no question 15 pending, right, we could maybe take a 16 ten-minute break while counsel addresses 17 his computer situation. It's 10:50, maybe 18 we could take until 11:00?</p> <p>19 THE REPORTER: Okay. That's fine 20 with me.</p> <p>21 (WHEREUPON, a short 22 break was taken.)</p> <p>23 BY MR. MORRISSEY: 24 Q When Globetrotters looked at the</p>
<p style="text-align: right;">Page 47</p> <p>1 Did Globetrotters prepare a report 2 based on their inspection of Cermak to your 3 knowledge?</p> <p>4 A I haven't seen a report from 5 Globetrotters, so I don't know.</p> <p>6 Q When Globetrotters was present, did 7 you ask them to look at the RTU ramps?</p> <p>8 A No.</p> <p>9 Q Why not?</p> <p>10 A Because that's not my job.</p> <p>11 Q Whose job is it to ask an architect 12 to look at the RTU ramps?</p> <p>13 A Capital Planning's.</p> <p>14 Q And who from Capital Planning?</p> <p>15 A Well, they have an organization and 16 it probably depends on what project director is 17 assigned to what building, so I wouldn't know 18 whose responsibility it would be to direct 19 Globetrotters to assess a certain building. I 20 don't work for them.</p> <p>21 Q Have you asked Capital Planning to 22 conduct an assessment of these RTU ramps?</p> <p>23 A For the third or fourth time now, 24 Patrick, I have said that I, as you've showed</p>	<p style="text-align: right;">Page 49</p> <p>1 Cermak ramp, did they ever -- did they tell you 2 that there were any barriers with the ramp?</p> <p>3 A No.</p> <p>4 Q Did you ever ask them whether they 5 observed any barriers in the RTU -- in the 6 Cermak ramp? Excuse me.</p> <p>7 A No.</p> <p>8 Q Why didn't you ask them?</p> <p>9 A Because they're not there to answer 10 my questions. They are there to conduct an 11 assessment for Capital Planning.</p> <p>12 Q Did you ask them what the 13 requirements are under the ADA for a ramp?</p> <p>14 A No.</p> <p>15 Q Did you ask them whether a ramp needs 16 handrails?</p> <p>17 A Let's just, like, put this whole line 18 of questioning to bed. So I can tell you, 19 Patrick, I didn't ask them anything.</p> <p>20 Q Who from Capital Planning is in 21 charge of having the RTU ramps be assessed by 22 architects for ADA compliance to your 23 knowledge?</p> <p>24 MR. DEVORE: Objection, asked and</p>

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14 (Pages 50 to 53)

<p style="text-align: right;">Page 50</p> <p>1 answered.</p> <p>2 BY THE WITNESS:</p> <p>3 A I think you already asked me a</p> <p>4 similar question. I don't know the individual</p> <p>5 job responsibilities of the Capital Planning</p> <p>6 members. So you would have to ask them.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Do you have any people from Capital</p> <p>9 Planning that you are in contact with regarding</p> <p>10 barriers at the Cook County Jail?</p> <p>11 A That I'm in contact with? I mean, I</p> <p>12 don't know what you mean by that, but I attend</p> <p>13 meetings with various capital planning members</p> <p>14 about various things.</p> <p>15 Q Does Eric Davis attend those</p> <p>16 meetings?</p> <p>17 A Sometimes.</p> <p>18 Q Who else attends those meetings from</p> <p>19 Capital Planning?</p> <p>20 A Whoever is designated to attend on</p> <p>21 that day. I don't know.</p> <p>22 Q Other than Eric Davis, do you know</p> <p>23 anybody else from Capital Planning who have</p> <p>24 attended the meetings?</p>	<p style="text-align: right;">Page 52</p> <p>1 lower level of the RTU?</p> <p>2 A The RTU doesn't have any ramps.</p> <p>3 Q What do they have?</p> <p>4 A I mean, they have floors. The RTU</p> <p>5 has floors and tiers and living units and</p> <p>6 offices. I mean, it's a building.</p> <p>7 Q How do you get from the RTU to Cermak</p> <p>8 using the underground tunnel system?</p> <p>9 A You just answered your own question.</p> <p>10 You could use the underground tunnel system or</p> <p>11 you could walk outside.</p> <p>12 Q And if you were going to use the</p> <p>13 underground tunnel system, tell me which way</p> <p>14 you would walk to get to Cermak?</p> <p>15 A It depends on which way I wanted to</p> <p>16 walk. I mean, there's various ways you could</p> <p>17 go.</p> <p>18 Q Tell me the different ways you could</p> <p>19 go.</p> <p>20 A Through different tunnels.</p> <p>21 Q Is there one tunnel on the north side</p> <p>22 of the RTU?</p> <p>23 A I'm not good with directions, but</p> <p>24 there's multiple tunnels and none of them lead</p>
<p style="text-align: right;">Page 51</p> <p>1 A It would depend on the day but, yeah,</p> <p>2 there's different members. I don't keep a</p> <p>3 list.</p> <p>4 Q Can you tell me any of the people</p> <p>5 that you recall ever attending a meeting from</p> <p>6 Capital Planning?</p> <p>7 A I think there is someone named Dave.</p> <p>8 I think there's a woman named Kate. I don't</p> <p>9 know their roles but there's various people. I</p> <p>10 don't take attendance.</p> <p>11 Q Have you assessed the RTU ramps to</p> <p>12 see whether they comply with the ADA?</p> <p>13 A No.</p> <p>14 Q What year was the RTU constructed?</p> <p>15 A I don't specifically recall, but I</p> <p>16 think sometime around 2013 it was finalized.</p> <p>17 MR. DEVORE: Patrick, I'm sorry.</p> <p>18 Just to be clear, you said "you," meaning</p> <p>19 Sabrina individually, correct, in terms of</p> <p>20 assessment?</p> <p>21 MR. MORRISSEY: Right, right.</p> <p>22 MR. DEVORE: Okay.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q So how many ramps are there in the</p>	<p style="text-align: right;">Page 53</p> <p>1 from the RTU. I want to clarify because I</p> <p>2 already said that there's no tunnels in the</p> <p>3 RTU, but you keep insisting that there are.</p> <p>4 The RTU is Floors 2 through 5. So there's no</p> <p>5 tunnels on Floors 2 through 5.</p> <p>6 Q Is there a first floor in that</p> <p>7 building?</p> <p>8 A There's a first floor in the</p> <p>9 building, yes.</p> <p>10 Q How about a ground floor in the</p> <p>11 building?</p> <p>12 A There is a ground floor in the</p> <p>13 building, yes, but that's not the RTU.</p> <p>14 Q What do you call that location?</p> <p>15 A Receiving, Trust and Classification.</p> <p>16 Q Is there an abbreviation you would</p> <p>17 use to refer to that area?</p> <p>18 A RTC sometimes.</p> <p>19 Q And you get from the RTC to Cermak</p> <p>20 using the underground tunnel system?</p> <p>21 A Are you asking me if I can get there</p> <p>22 using the underground tunnel system?</p> <p>23 Q Yes.</p> <p>24 A Yes.</p>

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15 (Pages 54 to 57)

<p style="text-align: right;">Page 54</p> <p>1 Q And tell me how you're able to do</p> <p>2 that. Tell me the pathway.</p> <p>3 A As I already stated, it would depend</p> <p>4 on which tunnel I chose to use on that day.</p> <p>5 Q How many tunnel options would you</p> <p>6 have?</p> <p>7 A Probably at least two. It depends.</p> <p>8 Q What does it depend on?</p> <p>9 A Again, it depends on what tunnel I'm</p> <p>10 using that day.</p> <p>11 Q When inmates are moved from the RTC</p> <p>12 to Cermak, do you know which tunnel route is</p> <p>13 generally used?</p> <p>14 A I don't know which one is generally</p> <p>15 used. They could use any of them.</p> <p>16 Q Have you given any training to staff</p> <p>17 about moving inmates from the RTC to Cermak and</p> <p>18 which tunnel route to use?</p> <p>19 A No, I don't give any training to tell</p> <p>20 the staff which tunnel to use, no.</p> <p>21 Q Why not?</p> <p>22 A Because that's not my role.</p> <p>23 Q Does one tunnel have an incline</p> <p>24 that's steeper than the other if you are going</p>	<p style="text-align: right;">Page 56</p> <p>1 Q I'm talking about the Cermak ramp.</p> <p>2 A And I'm asking you which ramp you're</p> <p>3 referring to.</p> <p>4 Q How many ramps are there in Cermak?</p> <p>5 A I guess it depends on how you define</p> <p>6 ramp. Is there a specific location that you're</p> <p>7 asking me about?</p> <p>8 Q Sure. The ramp to get from Cermak to</p> <p>9 the RTU?</p> <p>10 A There is no ramp from Cermak to RTU</p> <p>11 as I already said. There's no ramps in RTU.</p> <p>12 Q Isn't there are ramp in the lower</p> <p>13 level of Cermak that leads from the basement of</p> <p>14 Cermak to the RTU?</p> <p>15 A There's a ramp in the basement of</p> <p>16 Cermak that leads to a tunnel corridor that</p> <p>17 connects to multiple divisions. As I</p> <p>18 previously stated, RTU is Levels 2 through 5.</p> <p>19 There's no ramp that goes from the basement of</p> <p>20 Cermak to the second floor, third floor or</p> <p>21 fifth floor of RTU.</p> <p>22 Q So I'm talking about the Cermak ramp</p> <p>23 leading to the tunnels in the Cook County Jail.</p> <p>24 Are there signs on that ramp that tell</p>
<p style="text-align: right;">Page 55</p> <p>1 from the RTC to Cermak?</p> <p>2 A I don't know. I've never measured</p> <p>3 them.</p> <p>4 Q Why haven't you measured the tunnel</p> <p>5 inclines in the RTC?</p> <p>6 A Because that's not my role.</p> <p>7 Q Whose role is it?</p> <p>8 A I don't know. I guess it depends on</p> <p>9 the purpose for which they're being measured.</p> <p>10 Q Have you ever received an e-mail or</p> <p>11 wrote an e-mail suggesting that they should</p> <p>12 measure one of the tunnels from the RTC to</p> <p>13 Cermak?</p> <p>14 A Have I ever written an e-mail</p> <p>15 suggesting someone measure a tunnel?</p> <p>16 Q Right.</p> <p>17 A Not that I recall. No, I have never</p> <p>18 suggested somebody do that that I recall.</p> <p>19 Q Now, in the Cermak ramp, are there</p> <p>20 signs to tell detainees not to move up or down</p> <p>21 the ramp without an escort?</p> <p>22 A On the Cermak ramp?</p> <p>23 Q Right.</p> <p>24 A Which ramp are you referring to?</p>	<p style="text-align: right;">Page 57</p> <p>1 detainees not to move up or down without an</p> <p>2 officer escort?</p> <p>3 A I don't recall if there's signs that</p> <p>4 say don't move up or down without an escort.</p> <p>5 There may be.</p> <p>6 Q Is there a wheelchair located at the</p> <p>7 Cermak ramp for inmates with mobility</p> <p>8 limitations to request to use a wheelchair to</p> <p>9 go up or down the Cermak ramp?</p> <p>10 A I don't understand your question.</p> <p>11 Q Right. So the Cermak ramp, is there</p> <p>12 a wheelchair available for an inmate with a</p> <p>13 mobility impairment to request to use the</p> <p>14 wheelchair to go up or down the Cermak ramp?</p> <p>15 A Your question is really confusing.</p> <p>16 Are you asking if there's wheelchairs available</p> <p>17 for inmates who need them to go up or down the</p> <p>18 Cermak ramp? Is that what you're asking?</p> <p>19 Q Right.</p> <p>20 A So if an inmate has an order for a</p> <p>21 wheelchair and they need to use it, yeah,</p> <p>22 there's wheelchairs that are provided by Cermak</p> <p>23 to go anywhere that they need, yeah.</p> <p>24 Q What about for an inmate who uses a</p>

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16 (Pages 58 to 61)

<p style="text-align: right;">Page 58</p> <p>1 cane, crutch or walker, are there wheelchairs 2 for that inmate to use to go up or down the 3 Cermak ramp? 4 A Is this a hypothetical? I mean, 5 there could be, right, hypothetically speaking 6 because you're not speaking about any specific 7 incident, right? 8 Q Well, my question is, is there a 9 policy or procedure that you're aware of that 10 there's always a wheelchair available at the 11 Cermak ramp for an inmate with a cane, crutch 12 or walker to use to go up or down that ramp? 13 A Okay. As I already stated, 14 wheelchairs are available for inmates in our 15 custody depending on the Cermak order and the 16 needs of that situation. It's very context 17 specific, and you're asking a very vague, 18 incomplete hypothetical. So I'm not sure how 19 to answer it, but we have wheelchairs here to 20 assist detainees. 21 Q Are there wheelchairs specifically at 22 the Cermak ramp for an inmate who uses a cane, 23 crutch or walker to go up or down that ramp? 24 A I don't know how to answer your</p>	<p style="text-align: right;">Page 60</p> <p>1 staff to place them in a wheelchair to go up or 2 down the inclines? 3 A I'm lost. 4 MR. DEVORE: Objection to form. It's 5 very confusing. 6 BY MR. MORRISSEY: 7 Q Are there wheelchairs that are 8 stationed by the inclines in the RTC tunnel 9 system? 10 A I mean, your question assumes that 11 there's inclines, and I don't know how you 12 define that but, again, we don't have 13 wheelchairs just laying around in random areas 14 in this facility. It's a correctional 15 facility. 16 Q Are there notices by the inclines in 17 the RTC that an inmate should not go up or down 18 the incline without an officer escort? 19 A I mean, again, I don't know where 20 you're referring to, but there are notices all 21 around the Department of Corrections regarding 22 various things. 23 Q I'm talking specifically about the 24 inclines in the RTC tunnel.</p>
<p style="text-align: right;">Page 59</p> <p>1 question any better than I already did. 2 There's wheelchairs available at the Department 3 of Corrections. Is there a wheelchair sitting 4 there? Is that what you're asking, that's just 5 sitting there waiting for someone that might 6 need it? 7 Q Right. 8 A No. There's not a random wheelchair 9 just sitting on a ramp in a Department of 10 Corrections, no. Wheelchairs are assigned to 11 inmates and given to them when needed, not just 12 laying around the Department of Corrections. 13 Q What about for the RTU or the incline 14 in the RTC, are there wheelchairs at those 15 inclines that inmates can use, request to use, 16 to go up or down those inclines that have an 17 order for a cane, crutch or walker? 18 A I don't understand your question. 19 Q My question relates to the two 20 inclines in the RTC that lead to the tunnels. 21 Are there wheelchairs that are positioned in 22 close proximity to those inclines where an 23 inmate with a cane, crutch or walker alert can 24 request staff to be -- to use -- can request</p>	<p style="text-align: right;">Page 61</p> <p>1 A Right, but your question is assuming 2 facts that I can't give you. So, I mean, 3 there's notices all over the facility. 4 Q And what do the notices say? 5 A All sorts of things. 6 Q For example? 7 A For example, as you're well aware, 8 it's by the Leighton courthouse about going up 9 and down the ramp without assistance. There's 10 notices to stay off the walls. There's notices 11 about recording. There's notices about all 12 types of stuff. 13 Q Is there a similar notice that's at 14 the Leighton ramp, is that notice positioned by 15 the inclines in the RTU tunnel system? 16 A I don't understand your question. 17 Q My question is by the two inclines in 18 the RTC tunnel system, are there notices that 19 are similar to the notices at the Leighton 20 ramp? 21 A Again, your question assumes that 22 there's two inclines in RTU, which I don't know 23 what you mean by that, but there are several 24 notices all over the facility. So I don't know</p>

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17 (Pages 62 to 65)

<p style="text-align: right;">Page 62</p> <p>1 what specifically you're referring to.</p> <p>2 Q Have you received grievances from</p> <p>3 detainees about moving up or down the RTC</p> <p>4 inclines in the tunnel system?</p> <p>5 A I've received various grievances, but</p> <p>6 I don't know if any of them use the wording</p> <p>7 that you just gave me.</p> <p>8 Q And what grievances have you received</p> <p>9 regarding the incline at the RTC?</p> <p>10 A Again, I don't think I received any</p> <p>11 grievances regarding any inclines. I'm using</p> <p>12 your language. I don't think that was</p> <p>13 mentioned on any grievances; but I do receive</p> <p>14 and have received, the reason that we are here</p> <p>15 today, Patrick, Eugene Westmoreland wrote</p> <p>16 grievances about various areas of the tunnels</p> <p>17 in the Department of Corrections.</p> <p>18 Q And after you received his grievances</p> <p>19 about the inclines in the tunnels, what did you</p> <p>20 do?</p> <p>21 MR. DEVORE: Objection, assumes facts</p> <p>22 not in evidence. She just testified that</p> <p>23 she didn't recall any specific grievance</p> <p>24 regarding an incline, I believe, other</p>	<p style="text-align: right;">Page 64</p> <p>1 Q Why not?</p> <p>2 A Because the Sheriff's Office doesn't</p> <p>3 build, alter or construct buildings.</p> <p>4 Q And who, to your knowledge, is</p> <p>5 responsible for investigating complaints that a</p> <p>6 ramp or an incline is not compliant with the</p> <p>7 ADA structural standards?</p> <p>8 A I don't know that anyone is tasked</p> <p>9 with that specific job title that you are</p> <p>10 asking me about; but Capital Planning, as</p> <p>11 you're aware, is responsible for the buildings</p> <p>12 that we occupy.</p> <p>13 Q Did you preserve any videos of Eugene</p> <p>14 Westmoreland moving up or down ramps?</p> <p>15 A I believe I did.</p> <p>16 Q How many?</p> <p>17 A I don't recall how many. At least</p> <p>18 one.</p> <p>19 Q And what ramp did you preserve video</p> <p>20 of?</p> <p>21 A I'm not sure which one. Possibly</p> <p>22 Leighton. Maybe others. I don't recall.</p> <p>23 Q Have you ever spoken to</p> <p>24 Mr. Westmoreland about his allegation moving up</p>
<p style="text-align: right;">Page 63</p> <p>1 than -- yes, go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A Yeah, I know there's various</p> <p>4 grievances, but I don't remember any of them</p> <p>5 using the language of inclines, but usually my</p> <p>6 general process when I receive a grievance is</p> <p>7 to review the grievance, any available evidence</p> <p>8 which could be video, it could be talking to</p> <p>9 staff, it could be talking to the inmate and</p> <p>10 then answer the grievance to my -- best of my</p> <p>11 abilities.</p> <p>12 Q Have you ever done any investigation</p> <p>13 to see whether the RTU -- RTC inclines are</p> <p>14 compliant with the ADA?</p> <p>15 A No, no.</p> <p>16 Q Why not?</p> <p>17 A Because that's not my role.</p> <p>18 Q Have you ever told -- who -- strike</p> <p>19 that.</p> <p>20 Who within the Sheriff's Office is</p> <p>21 responsible for investigating complaints that</p> <p>22 ramps or inclines are not compliant with the</p> <p>23 ADA?</p> <p>24 A No one.</p>	<p style="text-align: right;">Page 65</p> <p>1 and down ramps caused his hands to burn and</p> <p>2 upper body pain?</p> <p>3 A I'm not sure if I asked him about his</p> <p>4 hands burning or body pain. But as I</p> <p>5 previously stated, I, as part of my grievance</p> <p>6 response, I do speak with the pertinent staff</p> <p>7 as well as the inmate to -- for my response.</p> <p>8 Q Now, in response to one grievance</p> <p>9 about moving from RTU to court, did you speak</p> <p>10 with staff about whether or not Eugene</p> <p>11 Westmoreland was escorted or pushed in his</p> <p>12 wheelchair?</p> <p>13 A I don't know which grievance you're</p> <p>14 referencing, so.</p> <p>15 Q Well, let me ask you a preliminary</p> <p>16 question. If a detainee refuses -- strike</p> <p>17 that.</p> <p>18 Is it your understanding that staff</p> <p>19 members must push wheelchair users up and down</p> <p>20 all ramps?</p> <p>21 A All ramps? I'm not sure that we</p> <p>22 direct them to push them up and down all ramps,</p> <p>23 but we do tell them that as part of</p> <p>24 accommodating an inmate with a disability that</p>

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18 (Pages 66 to 69)

<p style="text-align: right;">Page 66</p> <p>1 uses a wheelchair, we do assist them by pushing 2 them up and down ramps and through corridors 3 when necessary. 4 Q And how does an officer know whether 5 it's necessary to push a wheelchair user up and 6 down a ramp or up and down a corridor? 7 A Well, it's in our policy. 8 Q And what is your understanding of the 9 policy? 10 A My understanding of the policy is 11 what I have already told you is that we 12 accommodate inmates with disabilities by 13 assisting them when they're in a wheelchair. 14 That kind of assistance can vary from one 15 situation to the next, but it may include 16 pushing them up and down ramps. It may include 17 pushing them through corridors. It may include 18 other things. 19 Q So based on your understanding of the 20 Sheriff's policy, an officer does not have to 21 push a wheelchair up a ramp? 22 A They are advised to push them, yes, 23 unless that inmate refuses. That is the advice 24 that I give them, yes.</p>	<p style="text-align: right;">Page 68</p> <p>1 therefore, an officer can only push one? 2 A I have, yes. 3 Q How many different times have you 4 seen that situation? 5 A I don't know. I didn't count them 6 but at least once. 7 Q So how can an officer push two people 8 at one time if they are both in a wheelchair 9 and there is one officer escorting two 10 detainees? 11 A I don't know. I never said they 12 could. Are you asking a question that -- 13 whether that's possible, Patrick? I don't 14 understand your question. 15 Q Would an officer be violating any 16 rule or regulation to your knowledge if the 17 officer is escorting two wheelchair users in 18 the tunnel system at one time? 19 A No. 20 MR. DEVORE: Objection, vague. 21 BY THE WITNESS: 22 A I don't believe based on that 23 incomplete hypothetical that you gave me that 24 that would be a violation of policy.</p>
<p style="text-align: right;">Page 67</p> <p>1 Q What about corridors, is an officer 2 required to push a detainee in a wheelchair up 3 a corridor? 4 A Up a corridor? I'm not sure I 5 understand your question. 6 Q Well, does a correctional officer, if 7 he's escorting a wheelchair user through a 8 corridor, does the officer have to push the 9 wheelchair user? 10 A I mean, that's situation specific. I 11 prefer that they push wheelchairs when able, 12 but sometimes the situation doesn't allow for 13 it or sometimes the inmate refuses. 14 Q Can you tell me a situation that 15 would not allow an officer to push a wheelchair 16 in a corridor? 17 A An officer escorting multiple inmates 18 or an officer that is escorting multiple 19 inmates in wheelchairs would not be able to 20 push all of those wheelchairs but, I mean, 21 there are a lot of hypothetical situations 22 where they may not be able to do that. 23 Q Have you seen a video where an 24 officer escorts two wheelchair users and,</p>	<p style="text-align: right;">Page 69</p> <p>1 BY MR. MORRISSEY: 2 Q And why not? 3 A Because an officer couldn't push more 4 than one wheelchair at a time, could they? I 5 mean, hypothetically speaking because you're 6 giving me an incomplete hypothetical again. 7 Q In preparation for this deposition, 8 did you see a wheelchair -- two wheelchair 9 users being escorted by one officer? 10 A I think we already covered what I saw 11 or reviewed in preparation for this deposition, 12 so no. 13 Q Have you ever seen somebody use the 14 handrail in the RTC corridor? 15 A Somebody like a random person or like 16 anybody? Sure. Probably. 17 Q Have you ever seen a wheelchair user 18 the -- strike that. 19 Have you ever seen a wheelchair user 20 use the handrail on the RTC east corridor? 21 A Not that I recall. I'm not staring 22 at their hands. I don't know. 23 Q How about when you've conducted 24 audits, video audits, have you ever seen any</p>

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19 (Pages 70 to 73)

<p style="text-align: right;">Page 70</p> <p>1 wheelchair user use a handrail in the RTC</p> <p>2 corridor?</p> <p>3 A Not that I recall.</p> <p>4 Q What is your understanding of the</p> <p>5 purpose of a handrail for a corridor?</p> <p>6 A Are you speaking generally, Patrick,</p> <p>7 like the general use of handrails in corridors?</p> <p>8 Q Yes.</p> <p>9 A I mean, they are so people can hold</p> <p>10 onto them if needed, right? That's what a</p> <p>11 handrail is for.</p> <p>12 Q And are detainees allowed to use the</p> <p>13 handrails in the corridor system at the</p> <p>14 Department of Corrections?</p> <p>15 A So we don't disallow it. So, yeah,</p> <p>16 if they need to use the handrail, they can use</p> <p>17 the handrail. It's there. It's available.</p> <p>18 Q I'm going to show you Exhibit 17,</p> <p>19 which is a video. Give me a second.</p> <p>20 Ms. Rivero-Canchola, can you see my</p> <p>21 screen?</p> <p>22 A I can see your screen.</p> <p>23 Q And this is Exhibit 17 that I shared</p> <p>24 with defense counsel before the deposition.</p>	<p style="text-align: right;">Page 72</p> <p>1 A Are you assuming there's an incline</p> <p>2 there? I'm not going to assume from this</p> <p>3 picture that that reflects an incline. But</p> <p>4 this tunnel, depending on which direction you</p> <p>5 walk, could lead to the basement of RTC.</p> <p>6 Q And to go -- to reach the basement of</p> <p>7 the RTC, do you have to go down this decline?</p> <p>8 MR. DEVORE: Objection. She just</p> <p>9 testified she didn't know if there's an</p> <p>10 incline.</p> <p>11 BY THE WITNESS:</p> <p>12 A To reach the basement of RTC, you</p> <p>13 would have to proceed through this portion of</p> <p>14 the tunnel if you're walking in that direction</p> <p>15 but, yeah, that's not the only direction you</p> <p>16 could go.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q And as you sit here today, you don't</p> <p>19 know whether this tunnel has a decline?</p> <p>20 A What I'm saying is I don't understand</p> <p>21 how you're defining decline, so I'm not going</p> <p>22 to use that word.</p> <p>23 Q Do you know whether the top of this</p> <p>24 corridor is higher than the bottom of this</p>
<p style="text-align: right;">Page 71</p> <p>1 Do you recognize this location?</p> <p>2 A I do.</p> <p>3 Q And how do you recognize this</p> <p>4 location?</p> <p>5 A It's one of the tunnels at the</p> <p>6 Department of Corrections.</p> <p>7 Q And where does this tunnel go?</p> <p>8 A This tunnel goes to multiple areas.</p> <p>9 Q Do you see that there's an incline in</p> <p>10 this video?</p> <p>11 A Are you asking me if you're -- first</p> <p>12 of all, I'm not seeing a video. I'm seeing a</p> <p>13 screen shot. Are you asking me if your screen</p> <p>14 shot reflects an incline? I can't tell from</p> <p>15 this.</p> <p>16 Q Do you see that there are handrails</p> <p>17 on at least one side of this -- in this tunnel</p> <p>18 corridor?</p> <p>19 A From this picture, it appears to be a</p> <p>20 handrail, yes, on the left-hand side.</p> <p>21 Q Have you ever walked this corridor?</p> <p>22 A Yes.</p> <p>23 Q And if you go straight and down this</p> <p>24 incline, where does it lead to?</p>	<p style="text-align: right;">Page 73</p> <p>1 corridor?</p> <p>2 A I've never measured it, Patrick, so I</p> <p>3 don't know.</p> <p>4 Q Well, I'll play this video. I'm</p> <p>5 going to stop the video after eight seconds.</p> <p>6 Do you recognize any of these two</p> <p>7 detainees in a wheelchair?</p> <p>8 A I mean, this isn't the greatest</p> <p>9 picture but I think so.</p> <p>10 Q Who are they?</p> <p>11 A Well, the one that the officer is</p> <p>12 pushing appears to be possibly Inmate Williams.</p> <p>13 It could be another inmate. I'm not sure.</p> <p>14 Q How about the inmate on the left?</p> <p>15 A I can only see the back of his head,</p> <p>16 so I don't know.</p> <p>17 Q Do you know the officer?</p> <p>18 A I'm not entirely sure who that is,</p> <p>19 no.</p> <p>20 Q I'll continue playing the video. I'm</p> <p>21 going to stop the video. Do you see one of the</p> <p>22 inmates is being pushed by the officer, and the</p> <p>23 other inmate does not have an officer escort?</p> <p>24 A I do see that, yes.</p>

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20 (Pages 74 to 77)

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1 Q Based on your -- strike that. And
2 this is -- this can happen at the Cook County
3 Jail, one officer can escort two wheelchair
4 users at one time?

5 A One officer can escort multiple
6 inmates at one time, yes.

7 Q As you sit here today, do you know
8 whether this officer is required, pursuant to
9 the policy at the Sheriff's Office, to push
10 every wheelchair user up and down this
11 corridor?

12 A I think I already stated the
13 Sheriff's Office policy is to provide
14 reasonable accommodation to our inmates with
15 disabilities including those in wheelchairs and
16 that's what this video appears to demonstrate.
17 The officer is providing that assistance.

18 Q To only one of the two wheelchair
19 users, right?

20 A Based on this video, he's pushing one
21 but we don't know the context of why there is
22 no one pushing the other one, and I'm not going
23 to assume that.

24 Q If an officer does not push a

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1 using them.

2 Q Have you ever watched video of Eugene
3 Westmoreland walking up this corridor?

4 A No.

5 Q I'm going to share my screen again
6 and show you Exhibit 42.

7 Ms. Rivero-Canchola, do you see this
8 is another video of that corridor?

9 A I mean, this appears to be a
10 different video of possibly the same corridor.
11 I cannot tell from this still shot.

12 Q Well, do you see the top of it, of
13 this video, says Tunnel-Cam_0.108_CMK_to_RTU_West?

14 A Yes. It says that at the top of this
15 still shot.

16 Q And is that how some of the cameras
17 are labeled at the Cook County Jail?

18 A Yeah, it could be how they're
19 labeled. A lot of -- they're labeled a lot of
20 ways.

21 Q So from looking at this exhibit
22 compared to the prior exhibit, you don't know
23 whether this is the same corridor that we're
24 looking at?

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1 wheelchair user in a corridor, is the officer
2 supposed to document the refusal of assistance?

3 A It depends on the context. I mean,
4 you're assuming that there was a refusal here.
5 I don't know the context of this situation. So
6 I don't know how to answer that.

7 Q Do you see this inmate in the
8 wheelchair on the left is -- has his hand on
9 the railing?

10 A From this still shot, it appears
11 that, yeah, his hand is on the railing.

12 Q And based on this still shot -- and I
13 can continue playing the video. I'm stopping
14 the video. Did you see that inmate use the
15 railing while he was moving down this corridor
16 in his wheelchair?

17 A It looks like he is using the railing
18 from this video, yes.

19 Q And is it permissible for a
20 wheelchair user like this inmate to use a hand
21 railing?

22 A I think you already asked me that,
23 and I said the handrails are there for a
24 reason, sure. So we don't disallow them from

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1 A I didn't study the caption on the
2 top, Patrick. So it appears to be the same
3 corridor, but I'm not sure.

4 Q Do you want me to flip back to the
5 prior video so you could compare the name of
6 the camera?

7 A I mean, if it's relevant to your
8 question. Are you going to ask me a question
9 about this video that you're showing because it
10 doesn't appear to be Eugene Westmoreland, the
11 reason we're here today.

12 Q This is Eugene Westmoreland.

13 A Oh, is it? Okay. I didn't know
14 that. So you asked me if I ever saw him
15 walking up the ramp and I said no. So I sure
16 the heck can't tell who that is in that video.

17 Q Do you know Officer Richard?

18 A I know multiple officers with the
19 name Richard.

20 Q How about Officer William Richard?

21 A What? I didn't hear what you said.

22 Q Officer William Richard?

23 A I don't usually know their first
24 names.

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21 (Pages 78 to 81)

<p style="text-align: right;">Page 78</p> <p>1 Q Is there an Officer Richard that</p> <p>2 works in the RTU that moves detainees</p> <p>3 generally?</p> <p>4 A I mean, there was multiple officers</p> <p>5 named Richard that worked in the RTU.</p> <p>6 Q All right. I'm going to continue --</p> <p>7 I'm going to play this video exhibit. Do you</p> <p>8 see how that inmate stumbled when he was moving</p> <p>9 through that corridor?</p> <p>10 A Yeah, he appears to stumble. Yes.</p> <p>11 Q And did you see the inmate reach out</p> <p>12 to the hand railing after he stumbled?</p> <p>13 A It looks like he went to catch his</p> <p>14 balance, yes.</p> <p>15 Q From looking at this image of the</p> <p>16 corridor, and this is the east corridor, do you</p> <p>17 see any signs around this corridor regarding</p> <p>18 movement by detainees up or down this corridor?</p> <p>19 A Can you rephrase your question?</p> <p>20 Q You mentioned how Leighton has a</p> <p>21 notice for detainees who go up and down the</p> <p>22 ramp?</p> <p>23 A Correct.</p> <p>24 Q From looking at this image of the</p>	<p style="text-align: right;">Page 80</p> <p>1 about inmate movement, housing, toilets being</p> <p>2 broken, I think being relocated from one tier</p> <p>3 to another. He made a lot of allegations.</p> <p>4 Q Did you talk to Mr. Westmoreland</p> <p>5 about all of his various allegations?</p> <p>6 A As I previously stated, whenever I</p> <p>7 received a grievance from an inmate as part of</p> <p>8 my process, I discuss those allegations.</p> <p>9 Q Did any of Mr. Westmoreland's</p> <p>10 allegations have merit?</p> <p>11 A I don't believe they do, no.</p> <p>12 Q So none of them have merit?</p> <p>13 A I don't know what you mean by merit,</p> <p>14 Patrick. I mean, I guess that's a legal</p> <p>15 conclusion it sounds like.</p> <p>16 Q Well, did you consider any of</p> <p>17 Mr. Westmoreland's allegations to be frivolous?</p> <p>18 MR. DEVORE: Objection as to form and</p> <p>19 I just want to make it clear we're talking</p> <p>20 about grievances in this case, correct?</p> <p>21 BY THE WITNESS:</p> <p>22 A Yeah, what are we talking about? I'm</p> <p>23 not quite sure. We went in so many directions</p> <p>24 at this point in this deposition, I'm not sure</p>
<p style="text-align: right;">Page 79</p> <p>1 corridor from RTC to Cermak, do you see any</p> <p>2 signs or postings?</p> <p>3 A In this image, no, I don't see any</p> <p>4 signs or postings.</p> <p>5 Q What is your understanding of the</p> <p>6 allegations in this lawsuit?</p> <p>7 A Which one?</p> <p>8 Q Mr. Westmoreland's lawsuit that we</p> <p>9 are here for today?</p> <p>10 A Well, Mr. Westmoreland has multiple</p> <p>11 lawsuits, but I believe for the case that we</p> <p>12 were here to discuss today, although we haven't</p> <p>13 really spent much time on it, is</p> <p>14 Mr. Westmoreland's allegations regarding the</p> <p>15 accommodations that he was provided while in</p> <p>16 our custody.</p> <p>17 Q Relating to what?</p> <p>18 A Relating to his time in our custody.</p> <p>19 Q Do you have any more specific</p> <p>20 information about the allegations that we're</p> <p>21 here for today?</p> <p>22 A I mean, Mr. Westmoreland made a lot</p> <p>23 of allegations. He was a pretty litigious</p> <p>24 person, but he made all sorts of allegations</p>	<p style="text-align: right;">Page 81</p> <p>1 what you're asking me, Patrick.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q Well, you mentioned that</p> <p>4 Mr. Westmoreland was litigious, right?</p> <p>5 A He is, as most of your clients are,</p> <p>6 yes.</p> <p>7 Q And why do you call Mr. Westmoreland</p> <p>8 litigious?</p> <p>9 A Well, in my opinion, Mr. Westmoreland</p> <p>10 was always kind of gearing actions and making</p> <p>11 complaints in a way to get some kind of</p> <p>12 secondary gain, monetary gain, file a lawsuit.</p> <p>13 Q So what secondary gain did</p> <p>14 Mr. Westmoreland have by filing his lawsuits?</p> <p>15 A He wants money.</p> <p>16 Q For what?</p> <p>17 A To pad his commissary account while</p> <p>18 he's in prison.</p> <p>19 Q Is there anything wrong with</p> <p>20 Mr. Westmoreland seeking compensation for</p> <p>21 allegations he believed were wrong at the Cook</p> <p>22 County Jail?</p> <p>23 MR. DEVORE: Objection, it requests a</p> <p>24 response outside the knowledge of this</p>

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22 (Pages 82 to 85)

<p style="text-align: right;">Page 82</p> <p>1 particular witness.</p> <p>2 BY THE WITNESS:</p> <p>3 A I don't even know what you're asking</p> <p>4 me at this point. I think generally it's wrong</p> <p>5 to lie about facts or exaggerate or attempt to</p> <p>6 set up our staff in order to file a lawsuit and</p> <p>7 get funds or be compensated, as in your words,</p> <p>8 for an injury that didn't occur.</p> <p>9 BY MR. MORRISSEY:</p> <p>10 Q You're aware that he had a lawsuit</p> <p>11 that settled, correct?</p> <p>12 A I'm aware he had a lawsuit that</p> <p>13 settled.</p> <p>14 Q And is it your belief he lied or</p> <p>15 exaggerated to get compensation in that case?</p> <p>16 MR. DEVORE: Objection, calls for</p> <p>17 speculation and also deals with issues not</p> <p>18 related to this case.</p> <p>19 BY THE WITNESS:</p> <p>20 A Also seems to, I don't know, assume</p> <p>21 that settlement equals a liability or that we</p> <p>22 assumed some kind of wrongdoing there, which is</p> <p>23 really unethical on your part, Patrick. I</p> <p>24 mean, so are you using -- are you saying that</p>	<p style="text-align: right;">Page 84</p> <p>1 assisted when, in fact, he declined assistance</p> <p>2 in certain situations or saying that a toilet</p> <p>3 was broken when it wasn't broken. I mean,</p> <p>4 there were multiple instances where</p> <p>5 Mr. Westmoreland misrepresented things.</p> <p>6 Q What facts did he exaggerate?</p> <p>7 A I think I just answered that.</p> <p>8 Q Can you tell me what facts he</p> <p>9 exaggerated?</p> <p>10 A If you want to review my grievances</p> <p>11 that we tendered in this case, Patrick, yes, I</p> <p>12 can read my responses to you. I mean, I do an</p> <p>13 investigation every time a grievance is filed.</p> <p>14 So you can see my answer and where I disagree</p> <p>15 with Westmoreland's version of the facts.</p> <p>16 Q Do you remember a grievance was</p> <p>17 written by Mr. Westmoreland saying that there</p> <p>18 was a long steep noncompliant RTU ramp?</p> <p>19 A I believe he wrote a couple of</p> <p>20 grievances about ramps, yeah.</p> <p>21 Q Do you know whether that's accurate,</p> <p>22 whether there is a long steep noncompliant RTU</p> <p>23 ramp?</p> <p>24 MR. DEVORE: Objection, vague.</p>
<p style="text-align: right;">Page 83</p> <p>1 because we settled, we admitted wrongdoing? I</p> <p>2 don't like that.</p> <p>3 BY MR. MORRISSEY:</p> <p>4 Q Well, I'm asking you do you believe</p> <p>5 Mr. Westmoreland lied or exaggerated in the</p> <p>6 litigation that was resolved by the Sheriff's</p> <p>7 Office?</p> <p>8 MR. DEVORE: Objection, calls for</p> <p>9 speculation.</p> <p>10 BY THE WITNESS:</p> <p>11 A I didn't get to review all of that</p> <p>12 information unfortunately because the case</p> <p>13 didn't go to trial. So I'm going to reserve my</p> <p>14 judgment, but I do -- will say that, in</p> <p>15 general, I found Mr. Westmoreland's claims to</p> <p>16 be untruthful often.</p> <p>17 BY MR. MORRISSEY:</p> <p>18 Q Tell me what was untruthful about</p> <p>19 claims made by Mr. Westmoreland.</p> <p>20 A I think you can see that in my</p> <p>21 grievance answers that were tendered in this</p> <p>22 case. Often Mr. Westmoreland was exaggerating</p> <p>23 facts or not providing complete facts on what</p> <p>24 occurred that day saying that he was not</p>	<p style="text-align: right;">Page 85</p> <p>1 BY THE WITNESS:</p> <p>2 A Yeah, I don't know how he was</p> <p>3 evaluating whether it's noncompliant. I mean,</p> <p>4 I don't know how an inmate evaluates ADA</p> <p>5 compliance, but that was his opinion, yeah, not</p> <p>6 a statement of law.</p> <p>7 BY MR. MORRISSEY:</p> <p>8 Q Is it your opinion that statement was</p> <p>9 an exaggeration?</p> <p>10 MR. DEVORE: Objection, vague as to</p> <p>11 what statement and what grievance, what</p> <p>12 time frame.</p> <p>13 BY THE WITNESS:</p> <p>14 A So if you're referring to the</p> <p>15 statement that Westmoreland makes about a long</p> <p>16 noncompliant ramp, I believe that's his</p> <p>17 personal opinion, not a fact and not a</p> <p>18 statement of law.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q Did you do anything to investigate</p> <p>21 whether Mr. Westmoreland's statement is true or</p> <p>22 not true about there being a long steep</p> <p>23 noncompliant RTU ramp?</p> <p>24 A I think as we already discussed, it's</p>

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23 (Pages 86 to 89)

<p style="text-align: right;">Page 86</p> <p>1 not my job to evaluate the accessibility of the 2 buildings that we occupy, and that's why I 3 requested that Capital Planning do that because 4 that's their function. I don't take 5 measurements. 6 Q Did you make a request to Capital 7 Planning after you received Mr. Westmoreland's 8 grievance or did you do it before? 9 A I mean, if you want to put that 10 document back up on the screen, Patrick, and 11 refer to the date. I don't remember the date 12 on that document versus the date on 13 Westmoreland's grievance, so I don't know. 14 Q Well, I'll put the document up. It's 15 Exhibit 26. Do you see the FY19 Business Case, 16 Ms. Rivero-Canchola? 17 A I see that the date on the project 18 title is April 3rd, 2018. 19 Q So is that the date that you 20 requested Capital Planning to conduct the 21 entire ADA assessment of the Cook County 22 Department of Corrections? 23 A That was the date this document was 24 drafted.</p>	<p style="text-align: right;">Page 88</p> <p>1 not in evidence, misstates prior testimony. 2 BY THE WITNESS: 3 A Right. Yeah, I don't think that's 4 fair, no. 5 BY MR. MORRISSEY: 6 Q Why isn't that fair? 7 A I don't think we're still waiting. 8 As I previously said, we're in process. 9 Q But Capital Planning has not told you 10 whether the RTU corridors have been analyzed 11 for ADA accessibility; is that true? 12 A They have not told me that, no. 13 Q And Capital Planning hasn't told you 14 about the progress of doing the ADA assessment 15 for Cermak, correct? 16 A I think we already talked about this, 17 and the ADA assessment for Cermak is ongoing. 18 Q Right, but you haven't received any 19 report from -- relating to the ADA assessment 20 at Cermak; is that fair to say? 21 A Correct. You already asked me that. 22 Q So if you haven't received the 23 results of the ADA assessment for the RTU 24 corridors, how do you know whether</p>
<p style="text-align: right;">Page 87</p> <p>1 Q And after this document was drafted, 2 was it transmitted to Capital Planning? 3 A I believe it was, yes. 4 Q So this FY19 Business Case dated 5 4/3/2018, this is what you're referring to as 6 your request to conduct an ADA assessment of 7 the entire Cook County Jail campus; is that 8 true? 9 A That's what this document says, yes. 10 I believe the document speaks for itself. 11 Q After you helped prepare this 12 document, have you been in contact with Capital 13 Planning to see how they're coming along with 14 the ADA assessment? 15 A I have monthly meetings with Capital 16 Planning about all of their projects, which 17 they provide updates about, not just this one. 18 So I'm constantly in contact with them about 19 all of their projects. 20 Q So it's been about four or maybe five 21 years, and we're still waiting for Capital 22 Planning to conduct this ADA assessment; is 23 that fair? 24 MR. DEVORE: Objection, assumes facts</p>	<p style="text-align: right;">Page 89</p> <p>1 Mr. Westmoreland's statement at the RTU ramp is 2 not ADA compliant, how do you know whether 3 that's true or false? 4 A I think I already stated that that's 5 his personal opinion and not a statement of law 6 or not a statement of fact. I think once we 7 have the completed ADA assessment of all the 8 Department of Correction buildings, we'll have 9 a better answer to that. 10 Q Do you have any time when you expect 11 to have that assessment? 12 MR. DEVORE: Objection, asked and 13 answered. 14 BY THE WITNESS: 15 A No, I don't work for Capital 16 Planning, so I have no idea. 17 BY MR. MORRISSEY: 18 Q Have you asked Capital Planning when 19 they expect to have the assessment of the RTU 20 corridors? 21 A I have not asked them for a completed 22 date, no, and like I've already stated, it's in 23 process. Their entire assessment is ongoing. 24 Q Do you have access to Eugene</p>

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24 (Pages 90 to 93)

<p style="text-align: right;">Page 90</p> <p>1 Westmoreland's medical records?</p> <p>2 A I do not have access directly to his</p> <p>3 medical records, no.</p> <p>4 Q When you responded to his grievances,</p> <p>5 did you look at his medical records?</p> <p>6 A If I responded to his grievance that</p> <p>7 would have referenced something in the medical</p> <p>8 record, it would have been because I have</p> <p>9 talked with one of the medical providers, not</p> <p>10 accessed his records.</p> <p>11 Q Is it fair to say when you respond to</p> <p>12 a detainee grievance, you do not directly look</p> <p>13 into the detainee's medical records?</p> <p>14 A I do not directly look in the</p> <p>15 detainee's medical records, no.</p> <p>16 Q And so your knowledge comes from</p> <p>17 talking verbally or by e-mail with the medical</p> <p>18 staff members?</p> <p>19 A My knowledge comes from talking to</p> <p>20 his medical providers who do have access to the</p> <p>21 medical record, yes.</p> <p>22 Q Do the medical providers ever give</p> <p>23 you the medical records?</p> <p>24 A No.</p>	<p style="text-align: right;">Page 92</p> <p>1 A I do see that.</p> <p>2 Q And do you see Mr. Westmoreland is</p> <p>3 complaining about a long steep noncompliant RTU</p> <p>4 ramp, and date of incident is 12/16/22 and the</p> <p>5 time is between 9:00 and perhaps noon. Do you</p> <p>6 see that?</p> <p>7 A I do see that, yeah. I believe the</p> <p>8 document speaks for itself.</p> <p>9 Q And do you see he alleges that moving</p> <p>10 up and down the RTU ramp caused his hands to</p> <p>11 burn and upper body pain?</p> <p>12 A It says: Caused my hands, right and</p> <p>13 left, to burn, upper body pain in my already</p> <p>14 damaged upper body, yes, shoulder, back, neck</p> <p>15 and upper arms.</p> <p>16 Q And do you see this form was</p> <p>17 responded by D. Wilson, and D. Wilson says it</p> <p>18 was a repeat submission of 2022X18190?</p> <p>19 A That's what it says, yes.</p> <p>20 Q Is it fair to say you never reviewed</p> <p>21 this form by Mr. Westmoreland?</p> <p>22 A If it's a noncompliant grievance, no,</p> <p>23 it would not have been tendered to me.</p> <p>24 Q Is it fair to say you're not making</p>
<p style="text-align: right;">Page 91</p> <p>1 Q Why not?</p> <p>2 A Because they wouldn't need to or have</p> <p>3 to. That's not the scope of my employment.</p> <p>4 Q Is it fair to say you don't have</p> <p>5 access to detainee medical records because of</p> <p>6 HIPAA?</p> <p>7 A No, I wouldn't say that's fair to say</p> <p>8 because HIPAA contains exemptions for</p> <p>9 information sharing within correctional</p> <p>10 facilities.</p> <p>11 Q And what types of information can you</p> <p>12 obtain?</p> <p>13 A I don't know. I would refer you</p> <p>14 specifically to HIPAA and those exemptions.</p> <p>15 Q When you were preparing for your</p> <p>16 deposition, did you see that some of</p> <p>17 Mr. Westmoreland's complaints on the inmate</p> <p>18 grievance form were marked noncompliant</p> <p>19 grievance?</p> <p>20 A No.</p> <p>21 Q Now, I'm going to show you Exhibit 30.</p> <p>22 Do you see this document was marked noncompliant</p> <p>23 grievance, and it was given Control Number</p> <p>24 NC2204949?</p>	<p style="text-align: right;">Page 93</p> <p>1 any statements whether or not Mr. Westmoreland</p> <p>2 was being accurate in this form?</p> <p>3 A As I have already stated, I haven't</p> <p>4 reviewed this form. So I'm not making any</p> <p>5 statements, period, regarding that.</p> <p>6 Q And would you agree this form is a</p> <p>7 complaint about the RTU ramp, Exhibit 30?</p> <p>8 A I would agree that that is what it</p> <p>9 says: A long steep, even though steep is</p> <p>10 misspelled, noncompliance RTU ramp. That's</p> <p>11 what it says.</p> <p>12 Q And the required location, it says:</p> <p>13 RTU ramp leading to Cermak and back to RTU. Do</p> <p>14 you see that?</p> <p>15 A That's what it says.</p> <p>16 Q Now, if I show you Exhibit 28 -- I</p> <p>17 want you to remember this control number that</p> <p>18 they say it's a repeat. Do you see that,</p> <p>19 2022X18190?</p> <p>20 A 18190, correct.</p> <p>21 Q If we go to Exhibit 28, do you see</p> <p>22 this is -- 18190 is the control number?</p> <p>23 A It is.</p> <p>24 Q And do you see this is a grievance by</p>

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25 (Pages 94 to 97)

Page 94	Page 96
<p>1 Mr. Westmoreland regarding -- concerning the</p> <p>2 steep noncompliant ramps I used yesterday to</p> <p>3 reach Cermak?</p> <p>4 A That's what it says. Concerning the</p> <p>5 steep in the noncompliant ramps is what's</p> <p>6 written there, Patrick.</p> <p>7 Q And do you see there's 1 of 2 on the</p> <p>8 top right of this form?</p> <p>9 A Yes.</p> <p>10 Q An the next page it's 2 of 2, do you</p> <p>11 see that on Page 2 of 7?</p> <p>12 A Yes.</p> <p>13 Q And this complaint talks about</p> <p>14 another issue, right, not moving up or down</p> <p>15 ramps, right?</p> <p>16 A I mean, would you like me to read it,</p> <p>17 Patrick, before you ask me a question about it</p> <p>18 because I have already said I didn't get an</p> <p>19 opportunity to read it, so.</p> <p>20 Q Well, you can read this to yourself.</p> <p>21 A Thank you. Okay.</p> <p>22 Q Do you agree this complaint does not</p> <p>23 address ramps?</p> <p>24 A This complaint, I think it speaks for</p>	<p>1 A Yes, I did.</p> <p>2 Q Tell me what you did to respond to</p> <p>3 this grievance?</p> <p>4 A As I previously stated, I do the same</p> <p>5 things to respond to every grievance. I</p> <p>6 reviewed the available evidence. I speak with</p> <p>7 the pertinent staff and the inmate, and then I</p> <p>8 answer the grievance to the best of my ability.</p> <p>9 Q Did you review the video of</p> <p>10 Mr. Westmoreland going up or down any inclines</p> <p>11 from the RTU to Cermak and back?</p> <p>12 A Well, in the grievance, it states I</p> <p>13 reviewed the available evidence. I don't</p> <p>14 remember what available evidence there was at</p> <p>15 this point because this is December of 2022.</p> <p>16 Q Do you know whether you preserved the</p> <p>17 video of Mr. Westmoreland going up or down any</p> <p>18 of the inclines?</p> <p>19 A Any of what -- any of what inclines,</p> <p>20 Patrick?</p> <p>21 Q The inclines from traveling from the</p> <p>22 RTU to Cermak?</p> <p>23 A I believe we already addressed what</p> <p>24 videos that I requested to preserve, and I said</p>
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<p>1 itself but it seems to be about wheelchair --</p> <p>2 him sitting in a wheelchair and going to a</p> <p>3 doctor's appointment and being in Cermak.</p> <p>4 Q And it's the same control number as</p> <p>5 the one we looked at from the page before,</p> <p>6 right? It ends with 18190?</p> <p>7 A Correct, but it is Page 2 of that</p> <p>8 grievance.</p> <p>9 Q To your knowledge, do sometimes</p> <p>10 social workers combine two grievances into one</p> <p>11 control number?</p> <p>12 A I don't have any knowledge of how the</p> <p>13 social workers provide control numbers, so I</p> <p>14 don't know. This grievance has one control</p> <p>15 number, Patrick. We've already addressed that.</p> <p>16 Q And the control numbers are provided</p> <p>17 by who?</p> <p>18 A By Inmate Services.</p> <p>19 Q And that's a branch of the Sheriff's</p> <p>20 Office?</p> <p>21 A It is a department within the Cook</p> <p>22 County Sheriff's Office.</p> <p>23 Q And do you see you responded to this</p> <p>24 grievance on Page 3?</p>	<p>1 I preserved at least one video of him, and I</p> <p>2 believe it was the Leighton courthouse</p> <p>3 movement.</p> <p>4 Q If you were -- when you were</p> <p>5 responding to this video, why didn't you</p> <p>6 preserve the video of Mr. Westmoreland going up</p> <p>7 or down any of the corridor inclines?</p> <p>8 A Well, your question is assuming that</p> <p>9 I reviewed the video, which as I've stated, I</p> <p>10 reviewed the available evidence at that time.</p> <p>11 This was in 2022, so a year ago in December. I</p> <p>12 don't remember what evidence was available at</p> <p>13 that time.</p> <p>14 Q How long are the videos retained</p> <p>15 unless they are preserved?</p> <p>16 A Videos run on a 30-day loop as you're</p> <p>17 aware.</p> <p>18 Q Do you know which officer was</p> <p>19 escorting Mr. Westmoreland to Cermak and back?</p> <p>20 A As I sit here today, no, I don't</p> <p>21 recall who was escorting him a year ago during</p> <p>22 this grievance.</p> <p>23 Q Do you recall how you communicated</p> <p>24 with the transporting officer when you were</p>

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26 (Pages 98 to 101)

<p style="text-align: right;">Page 98</p> <p>1 investigating this grievance?</p> <p>2 A No.</p> <p>3 Q If an inmate in a wheelchair declines</p> <p>4 or refuses assistance, is the officer, pursuant</p> <p>5 to policy, supposed to document that?</p> <p>6 A Our policy does say they are supposed</p> <p>7 to document refusals of assistance, yes.</p> <p>8 Q Is it required by their policy?</p> <p>9 A As I just stated, our policy is that</p> <p>10 they document refusals of assistance.</p> <p>11 Q Was there any documentation that</p> <p>12 Mr. Westmoreland refused assistance up or down</p> <p>13 any corridor inclines or declines?</p> <p>14 A As I've already stated, when</p> <p>15 answering this grievance, I reviewed the</p> <p>16 available evidence before answering. And since</p> <p>17 this was a year ago, I don't remember what that</p> <p>18 evidence was.</p> <p>19 Q Did you talk to Mr. Westmoreland</p> <p>20 about whether he refused to have an officer</p> <p>21 push his wheelchair?</p> <p>22 A I spoke to Mr. Westmoreland about all</p> <p>23 of his ADA grievances.</p> <p>24 Q And what did he say?</p>	<p style="text-align: right;">Page 100</p> <p>1 an e-mail. They could do an informational</p> <p>2 report in CCOMS. They could do a memo. I</p> <p>3 mean, it would depend on the particular</p> <p>4 situation and the officer's method for wanting</p> <p>5 to document them.</p> <p>6 Q So the Sheriff's Office to your</p> <p>7 knowledge doesn't give any standard direction</p> <p>8 how staff members should document this, a</p> <p>9 refusal by an inmate?</p> <p>10 A The direction that I give during my</p> <p>11 training when I train new officers in the</p> <p>12 academy was I don't care how you document it,</p> <p>13 whether it be by e-mail, by memo or by incident</p> <p>14 report in CCOMS that our policy is that it</p> <p>15 should be documented.</p> <p>16 Q Have you ever received an e-mail</p> <p>17 documenting refusal?</p> <p>18 A I may have. I'm not sure.</p> <p>19 Q When you receive an e-mail</p> <p>20 documenting refusal, what do you do to make</p> <p>21 sure it's maintained by the Sheriff's Office?</p> <p>22 A I don't maintain e-mails, so I don't</p> <p>23 do anything to maintain e-mails. Our IT</p> <p>24 department does that.</p>
<p style="text-align: right;">Page 99</p> <p>1 A Of course he denied that he refused</p> <p>2 assistance.</p> <p>3 Q Why do you say "of course he denied"?</p> <p>4 A Because they always deny that they</p> <p>5 refused assistance.</p> <p>6 Q Did you provide subsequent training</p> <p>7 to the officers who escorted Mr. Westmoreland</p> <p>8 about pushing wheelchairs?</p> <p>9 A I'm not sure what follow-up action I</p> <p>10 took at this particular grievance but whenever</p> <p>11 there has been a deviation from a policy such</p> <p>12 as not documenting a refusal, I will always</p> <p>13 remind the staff member of what the policy is.</p> <p>14 Q And how is a staff member supposed to</p> <p>15 document refusals?</p> <p>16 A It could be various ways.</p> <p>17 Q Tell me how they are supposed to do</p> <p>18 it. Tell me the various ways a staff member</p> <p>19 could document a detainee refused to let an</p> <p>20 officer push his or her wheelchair?</p> <p>21 A Well, since video doesn't have audio,</p> <p>22 they could document it in various ways. They</p> <p>23 could send me an e-mail saying the inmate</p> <p>24 refused. They could send their shift commander</p>	<p style="text-align: right;">Page 101</p> <p>1 Q Right, but do you keep a -- do you</p> <p>2 compile the information of situations where</p> <p>3 wheelchair users refuse to be pushed by staff?</p> <p>4 A What do you mean by "compile"?</p> <p>5 Q I mean do you save the information,</p> <p>6 all the instances where wheelchair users refuse</p> <p>7 to be pushed?</p> <p>8 A I don't delete e-mails. So if an</p> <p>9 e-mail was sent to me, then I'm sure IT would</p> <p>10 have a record of that; but as I mentioned,</p> <p>11 that's not the only way a documentation could</p> <p>12 occur.</p> <p>13 Q Do you know how the shift commander</p> <p>14 keeps track of the documentation that an inmate</p> <p>15 in a wheelchair refused assistance?</p> <p>16 A No.</p> <p>17 Q Now, to your knowledge,</p> <p>18 Ms. Rivero-Canchola, what is the NCCHC?</p> <p>19 A What does the what?</p> <p>20 Q Have you ever heard of the NCCHC?</p> <p>21 A No, I don't know what you are</p> <p>22 referring to.</p> <p>23 Q Let me ask you another question.</p> <p>24 When an inmate refuses a service, are there</p>

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27 (Pages 102 to 105)

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<p>1 guidelines to demonstrate how the refusal 2 should be documented?</p> <p>3 A I mean, your question is incredibly 4 vague. I have no idea what you mean by 5 service. It sounds like an incomplete 6 hypothetical.</p> <p>7 Q Well, when an inmate refuses to be 8 pushed by an officer in his wheelchair, does 9 the inmate have to sign anything acknowledging 10 that he or she refused to be pushed by the 11 officer?</p> <p>12 A No. We don't have a policy on 13 requiring inmates to sign refusals of 14 assistance, and generally inmates refuse to 15 sign anything that we provide them. So, no, we 16 don't do that.</p> <p>17 Q Why not?</p> <p>18 A I think I just answered that. 19 Generally, inmates don't sign things that we 20 ask them to sign. And our policy is that the 21 officer document the refusal, not that the 22 inmate document the refusal.</p> <p>23 Q But when inmates refuse medical care, 24 Ms. Rivero-Canchola, don't the inmates have to</p>	<p>1 knowledge of these inmate medical refusals than 2 I do.</p> <p>3 Q Let me ask you this: Why wouldn't 4 you have a similar process when an inmate in a 5 wheelchair refuses assistance moving up or down 6 in a corridor or up and down a ramp?</p> <p>7 MR. DEVORE: Objection, calls for 8 speculation. Go ahead.</p> <p>9 BY THE WITNESS:</p> <p>10 A Yes. It sounds like you're asking me 11 to speculate on why we don't have the same 12 process that another Cook County entity has for 13 inmates refusing medical care. It seems like 14 those are two very different situations.</p> <p>15 BY MR. MORRISSEY:</p> <p>16 Q Do you see Mr. Westmoreland appealed 17 the response to your grievance?</p> <p>18 A He did.</p> <p>19 Q And do you see that Mr. Westmoreland 20 disputes your statements?</p> <p>21 MR. DEVORE: And we are referring to 22 Exhibit 28 still, right?</p> <p>23 MR. MORRISSEY: Right. 24</p>
Page 103	Page 105
<p>1 sign a refusal for healthcare?</p> <p>2 MR. DEVORE: Objection --</p> <p>3 BY THE WITNESS:</p> <p>4 A So --</p> <p>5 MR. DEVORE: -- outside the scope of 6 this litigation.</p> <p>7 THE WITNESS: Yeah, sorry, Jason, for 8 interrupting you.</p> <p>9 MR. DEVORE: No problem.</p> <p>10 BY THE WITNESS:</p> <p>11 A So there is a refusal of medical 12 services form that can be provided to them when 13 they refuse, depending on where they are 14 refusing services. Do they sign that every 15 time, definitely not, no.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q What happens when an inmate refuses 18 to sign a refusal for healthcare services?</p> <p>19 A Normally, the staff member would sign 20 as witness that they refused.</p> <p>21 Q Doesn't it require two staff members?</p> <p>22 A I mean, it could, Patrick. Are you -- 23 do you want to show me a document that you're 24 referring to because you seem to have more</p>	<p>1 BY THE WITNESS:</p> <p>2 A Exhibit 28, yes, provides 3 Mr. Westmoreland's answer to the appeal, which, 4 yes, disputes the facts that I discovered when 5 investigating this grievance.</p> <p>6 BY MR. MORRISSEY:</p> <p>7 Q And when you responded to 8 Mr. Westmoreland's grievance, was it your 9 understanding he was complaining about the RTU 10 incline and the Cermak incline -- strike that.</p> <p>11 What inclines did you believe 12 Mr. Westmoreland was complaining about in his 13 grievance that you responded to?</p> <p>14 A If you want to scroll back up, 15 Patrick, I mean, we can cover the topic again 16 of the wheelchair, but...</p> <p>17 Q All right. Well, I'm back to Page 1. 18 So when you responded to this, what ramps did 19 you understand Mr. Westmoreland to be 20 complaining about, was it the Cermak ramp? Was 21 it the RTU ramp?</p> <p>22 A So his grievance says: Required 23 specific location, RTU Cermak transport.</p> <p>24 Q So based on your review and</p>

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28 (Pages 106 to 109)

<p style="text-align: right;">Page 106</p> <p>1 investigation, what ramps did you believe he</p> <p>2 was complaining about?</p> <p>3 A My review would involve the path of</p> <p>4 travel for Mr. Westmoreland on that given day.</p> <p>5 Q Tell me what path of travel you would</p> <p>6 have investigated?</p> <p>7 A I think as we already covered,</p> <p>8 there's multiple paths of travel from RTC, the</p> <p>9 basement of RTU, to Cermak. So it could have</p> <p>10 been multiple paths to travel. Do I remember</p> <p>11 which one he took that day over a year ago, no.</p> <p>12 Q Based on your investigation, were</p> <p>13 there any inclines Mr. Westmoreland had to</p> <p>14 traverse when he was moving from RTC to Cermak?</p> <p>15 A I mean, I don't know what your</p> <p>16 definition of inclines is; but as we have</p> <p>17 already covered, there's a vast tunnel system</p> <p>18 in the Cook County Sheriff's Office. So it has</p> <p>19 a lot of corridors. It could have ramps. It</p> <p>20 could have a lot of different things, so.</p> <p>21 Q So when you were investigating this</p> <p>22 grievance, you weren't limited to just the</p> <p>23 Cermak ramp when you were investigating these</p> <p>24 allegations, correct?</p>	<p style="text-align: right;">Page 108</p> <p>1 training about what inclines or what parts of</p> <p>2 the corridor from the RTC to Cermak the staff</p> <p>3 should help push a wheelchair user?</p> <p>4 A I think you have already asked me</p> <p>5 that, and I said in my training we don't</p> <p>6 discuss specific areas of specific buildings.</p> <p>7 Q And what's the difference between a</p> <p>8 corridor and a ramp based on your understanding,</p> <p>9 Ms. Rivero-Canchola?</p> <p>10 A I guess that depends on the context,</p> <p>11 right? The ADA has different requirements for</p> <p>12 ramps than it does for other areas of the</p> <p>13 facility.</p> <p>14 Q Can you give me examples of what's in</p> <p>15 a ramp at the Department of Corrections?</p> <p>16 A Can I give you an example of a ramp?</p> <p>17 Q Right.</p> <p>18 A Sure. The Leighton ramp, that's a</p> <p>19 ramp.</p> <p>20 Q Why is that a ramp compared to a</p> <p>21 corridor?</p> <p>22 A Because the ADA says it is.</p> <p>23 Q How about Cermak, the incline from</p> <p>24 the basement of Cermak to the RTU, is that a</p>
<p style="text-align: right;">Page 107</p> <p>1 A Right. As I've previously stated, my</p> <p>2 review would involve the path of travel that</p> <p>3 Mr. Westmoreland took on this date that he</p> <p>4 provided on the grievance, which was</p> <p>5 December 12th of 2022.</p> <p>6 Q And during this path of travel, which</p> <p>7 sections of his travel was an officer supposed</p> <p>8 to be pushing Mr. Westmoreland?</p> <p>9 A As I have already stated, I don't</p> <p>10 know which path of travel that he took, and I</p> <p>11 think we also covered what the responsibilities</p> <p>12 are within our policy, which is to assist</p> <p>13 inmates who are disabled in whatever capacity</p> <p>14 that entails for that specific situation.</p> <p>15 Q So it's specific to the inmate,</p> <p>16 right, when the officer has to assist; is that</p> <p>17 fair?</p> <p>18 A It's specific to the situation. So</p> <p>19 it could include the inmate's needs at that</p> <p>20 time. It could include the structure. It</p> <p>21 could include how many inmates are being</p> <p>22 transported. It could include a lot of</p> <p>23 different factors.</p> <p>24 Q Did you give staff any specific</p>	<p style="text-align: right;">Page 109</p> <p>1 ramp?</p> <p>2 A It could be based on the</p> <p>3 measurements. I don't know. I didn't measure</p> <p>4 it. So it depends on what the standard was at</p> <p>5 the time when Cermak and that tunnel was built</p> <p>6 and what they were required to comply with.</p> <p>7 Q To your knowledge, are there any</p> <p>8 ramps in the RTC?</p> <p>9 A I believe that's a legal conclusion</p> <p>10 since the ADA has specifications for what</p> <p>11 qualifies as a ramp and what doesn't. So I'm</p> <p>12 going to leave that legal conclusion to the</p> <p>13 people who are responsible for making it.</p> <p>14 Q Now, does the written policy say that</p> <p>15 staff members should push subjects up and down</p> <p>16 ramps in CCSO facilities?</p> <p>17 A The policy says that that is an</p> <p>18 example of the type of accommodation you could</p> <p>19 give to an inmate in a wheelchair, yes.</p> <p>20 Q But there's no specific explanation</p> <p>21 in the policy that a staff member shall push a</p> <p>22 wheelchair subject up and down corridors?</p> <p>23 A Are you -- is that a statement or a</p> <p>24 question?</p>

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Page 110	Page 112
<p>1 Q Well, that's a question.</p> <p>2 A It didn't sound like a question. As</p> <p>3 I've stated, our policy provides the different</p> <p>4 type of accommodations that you could</p> <p>5 potentially give to an inmate in a wheelchair</p> <p>6 and pushing their wheelchair through corridors</p> <p>7 or up and down ramps is specifically stated in</p> <p>8 the policy as a type of accommodation that can</p> <p>9 be provided.</p> <p>10 Q Now, do you have any knowledge or</p> <p>11 understanding why the east corridor tunnel has</p> <p>12 hand railings on both sides?</p> <p>13 A The east corridor tunnel. Which</p> <p>14 portion of the east tunnel are you referring</p> <p>15 to?</p> <p>16 Q Well, remember we watched that video</p> <p>17 of the wheelchair user holding onto a railing</p> <p>18 going down the tunnel?</p> <p>19 A So that picture that you purported to</p> <p>20 be part of the tunnel would not be</p> <p>21 directionally east. If you are going from the</p> <p>22 Cermak building to RTU, I don't think that's</p> <p>23 east but, you know, I'm not good with</p> <p>24 directions but I don't think that's east. I</p>	<p>1 understand why that corridor has handrails?</p> <p>2 A No.</p> <p>3 Q Why not?</p> <p>4 A That's not within the scope of my</p> <p>5 employment.</p> <p>6 Q Is that within the scope of anybody's</p> <p>7 employment at the Cook County Sheriff's Office</p> <p>8 to your knowledge?</p> <p>9 MR. DEVORE: Objection, calls for</p> <p>10 speculation.</p> <p>11 BY THE WITNESS:</p> <p>12 A As I'm able to guess at this point,</p> <p>13 no. The Sheriff's Office is a tenant in the</p> <p>14 buildings of Cook County. So we don't have</p> <p>15 anything to do with the structures itself.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q And the north corridor was also</p> <p>18 discussed in the RTAs that the Sheriff's Office</p> <p>19 answered, right?</p> <p>20 A I believe that's written in the RTAs,</p> <p>21 yes.</p> <p>22 Q And did you see in the RTAs there's</p> <p>23 generally an admission that there are no</p> <p>24 handrails along the north corridor?</p>
Page 111	Page 113
<p>1 think that's west.</p> <p>2 Q Well, you looked at the admissions by</p> <p>3 the Sheriff in this case, right?</p> <p>4 A I did look at the RTAs.</p> <p>5 Q And you acknowledge one of the</p> <p>6 locations is called the east corridor?</p> <p>7 A Correct. That's in one of the RTAs.</p> <p>8 Q And the east corridor has -- they</p> <p>9 admitted it has hand railings, right?</p> <p>10 A So in that RTA, that is the language.</p> <p>11 However, that portion of the tunnel that you</p> <p>12 put up on the screen and are trying to get me</p> <p>13 to say is east runs in two directions, right?</p> <p>14 So if it runs from Cermak to RTU, it would have</p> <p>15 to be east and west and your direction appeared</p> <p>16 to be facing west. Again, I'm not -- I'm not</p> <p>17 going to say that I'm great with directions,</p> <p>18 but I think if you're going from Cermak to RTU,</p> <p>19 you're going west.</p> <p>20 Q But why does that location have</p> <p>21 handrails?</p> <p>22 A I don't know, Patrick. I didn't</p> <p>23 build the building.</p> <p>24 Q Did you ever ask anybody to</p>	<p>1 A I believe so, but I didn't write</p> <p>2 them, Patrick. So when they're answering these</p> <p>3 RTAs, I don't know which picture in their head</p> <p>4 they have of the tunnel or which part of the</p> <p>5 tunnel they're referring to because I didn't</p> <p>6 write them.</p> <p>7 MR. DEVORE: And if you could provide</p> <p>8 the actual request to admit, it would be</p> <p>9 helpful, I think.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Can you tell me, Ms. Rivero, why</p> <p>12 people would use the north corridor?</p> <p>13 A I mean, I can speculate. That's an</p> <p>14 incomplete hypothetical. Like generally why</p> <p>15 they would use a north part of the tunnel? It</p> <p>16 depends on where they're going. Like I said,</p> <p>17 there's a vast tunnel system here that takes</p> <p>18 you to different divisions and different areas.</p> <p>19 So the reason they would use it could vary.</p> <p>20 Q If you are going to court which</p> <p>21 corridor would you use, the east/west corridor</p> <p>22 or the north/south corridor?</p> <p>23 A You could use both.</p> <p>24 Q Is one pathway quicker to get to</p>

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30 (Pages 114 to 117)

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<p>1 Leighton courthouse?</p> <p>2 A Well, I don't know. I never timed</p> <p>3 it.</p> <p>4 Q Do you have any understanding about</p> <p>5 whether one passageway is quicker to reach the</p> <p>6 Leighton courthouse than the other?</p> <p>7 A No. I've never timed it.</p> <p>8 Q Do you know which path of travel</p> <p>9 staff generally use to move somebody who is</p> <p>10 housed in the RTU to the Leighton courthouse,</p> <p>11 the east/west or the north/south corridor?</p> <p>12 A They could use either.</p> <p>13 Q Do you know which way is normally</p> <p>14 used by staff members that escort detainees in</p> <p>15 wheelchairs?</p> <p>16 A That would depend on the officer</p> <p>17 escorting. They could use either.</p> <p>18 Q How about if a detainee is housed in</p> <p>19 the RTU and the detainee had a medical</p> <p>20 appointment at Cermak, do you know which</p> <p>21 corridor is quicker to reach the RTU? Is it</p> <p>22 the north/south corridor or the east/west</p> <p>23 corridor?</p> <p>24 A I don't know. I never timed it.</p>	<p>1 corridor or the north/south corridor?</p> <p>2 A Correct.</p> <p>3 Q How long does it take to travel the</p> <p>4 corridors from the RTC to Division 4?</p> <p>5 A I don't know. I never timed it.</p> <p>6 Q Do you know approximately how far it</p> <p>7 is in blocks?</p> <p>8 A No, I never measured it.</p> <p>9 MR. MORRISSEY: All right. Do you</p> <p>10 want to take a lunch break, like 45</p> <p>11 minutes?</p> <p>12 MR. DEVORE: How long do you think?</p> <p>13 I could go as short as needed.</p> <p>14 MR. MORRISSEY: Well, I have to go to</p> <p>15 a sandwich shop to get a sandwich, so it's</p> <p>16 going to take me -- well, I think 45 should</p> <p>17 be fine and then come back and probably</p> <p>18 finish up in an hour and a half or so.</p> <p>19 Okay?</p> <p>20 MR. DEVORE: Sabrina?</p> <p>21 THE WITNESS: I mean, I have a job to</p> <p>22 do that's not just depositions. We've</p> <p>23 already been at this for two and a half</p> <p>24 hours. So if I can skip lunch, Pat, I</p>
Page 115	Page 117
<p>1 Q Do you know which corridor is</p> <p>2 generally used?</p> <p>3 A They could use either.</p> <p>4 Q Yeah, but I'm asking, like, do you</p> <p>5 know which one is generally used?</p> <p>6 A No, I don't know which one is</p> <p>7 generally used. They could use either.</p> <p>8 MR. DEVORE: And objection assumes</p> <p>9 facts not in evidence.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Have you ever provided direction</p> <p>12 which corridor a staff should use when they are</p> <p>13 escorting a wheelchair user from RTU to Cermak?</p> <p>14 A You already asked me that. No.</p> <p>15 Q Why wouldn't you give direction about</p> <p>16 which corridor they should use?</p> <p>17 A I don't provide directions to staff</p> <p>18 on what tunnels they should use to get to their</p> <p>19 destination.</p> <p>20 Q Now, if somebody is being moved from</p> <p>21 RTU to Division 4 to vote, which corridor would</p> <p>22 be used to transport the wheelchair user?</p> <p>23 A Technically, it could be any.</p> <p>24 Q So it could either be the east/west</p>	<p>1 think that you can. So I would rather</p> <p>2 proceed with the deposition and get that</p> <p>3 done and then eat.</p> <p>4 (WHEREUPON, a discussion</p> <p>5 was held off the record.)</p> <p>6 (WHEREUPON, a lunch break</p> <p>7 was had.)</p> <p>8 MR. DEVORE: So before we took the</p> <p>9 break, you know, our witness was wanting</p> <p>10 to -- saying that she wanted to get through</p> <p>11 as quickly as possible, and one of the</p> <p>12 reasons for that, a big reason for that,</p> <p>13 there's some transportation issues that</p> <p>14 require her to get in her mode of</p> <p>15 transportation by 2:00, otherwise be left,</p> <p>16 which is what we would like to do is</p> <p>17 obviously if we can finish it by then, it</p> <p>18 would be fantastic.</p> <p>19 Alternatively, I'm not sure what</p> <p>20 the timing would be, but it may be from</p> <p>21 2:00 to 3:00. I'm not sure. And I just</p> <p>22 wanted to make a record of that, that we</p> <p>23 are trying to get things wrapped up and</p> <p>24 there was a reason why we were making that</p>

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<p style="text-align: right;">Page 118</p> <p>1 request before we took the break for lunch.</p> <p>2 MR. MORRISSEY: I didn't -- nobody</p> <p>3 told me about this before the break. I</p> <p>4 needed lunch. I took a -- I agreed to come</p> <p>5 back by 1:00 per the request to not have a</p> <p>6 45. So why don't we just keep going. At</p> <p>7 2:00, we'll have to address this.</p> <p>8 BY MR. MORRISSEY:</p> <p>9 Q Ms. Rivero-Canchola, I'm going to</p> <p>10 show you Exhibit 29, which is another grievance</p> <p>11 by Mr. Westmoreland. Do you see my screen? I</p> <p>12 could zoom in.</p> <p>13 Do you see this is a grievance with</p> <p>14 Eugene Westmoreland's name with Control Number</p> <p>15 2021 10912?</p> <p>16 A Yes, I see that.</p> <p>17 Q Is this a grievance -- I will show</p> <p>18 you the contents of the grievance zoomed in so</p> <p>19 you could see. Is this a grievance that you</p> <p>20 looked at to prepare for your deposition today?</p> <p>21 A I believe I did, yes.</p> <p>22 Q And I'll show you the next page where</p> <p>23 you have your response.</p> <p>24 Do you see your response?</p>	<p style="text-align: right;">Page 120</p> <p>1 Q So if a detainee is going to the</p> <p>2 court building at 26th and California in August</p> <p>3 of 2021, is it fair to say you don't know which</p> <p>4 corridors he would maneuver through when</p> <p>5 leaving his tier on the RTU to reach the</p> <p>6 Leighton courthouse?</p> <p>7 A No. That's not fair to say. As I</p> <p>8 stated previously, there's multiple corridors</p> <p>9 he could take. I didn't say that there's -- I</p> <p>10 don't know which ones they are.</p> <p>11 Q Do you know which corridors</p> <p>12 Mr. Westmoreland took relating to this</p> <p>13 grievance?</p> <p>14 A On this specific date, no.</p> <p>15 Q How many ramps would there be from</p> <p>16 Mr. Westmoreland's tier on 3F to the Leighton</p> <p>17 courthouse, how many ramps would he have to go</p> <p>18 up and down to reach the courthouse?</p> <p>19 A Well, I don't know how you define</p> <p>20 ramp, and I never counted the number of ramps</p> <p>21 between the Residential Treatment Unit and the</p> <p>22 Leighton courthouse.</p> <p>23 Q Based on your review of this</p> <p>24 grievance and your investigation, would you</p>
<p style="text-align: right;">Page 119</p> <p>1 A Yes.</p> <p>2 Q And then there's an appeal and a</p> <p>3 response to an appeal. Do you see that?</p> <p>4 A I see an appeal and a response to an</p> <p>5 appeal, yes.</p> <p>6 Q Going to the contents of the</p> <p>7 grievance, do you see Mr. Westmoreland is</p> <p>8 complaining about an incident on August 10,</p> <p>9 2021 and August 11, 2021?</p> <p>10 A Correct.</p> <p>11 Q When you investigated this complaint</p> <p>12 on behalf of the Sheriff, which ramps were you</p> <p>13 looking at to investigate Mr. Westmoreland's</p> <p>14 complaint?</p> <p>15 A I review all pertinent evidence at</p> <p>16 the time of investigating the grievance. I'm</p> <p>17 not saying that I would have to look at a</p> <p>18 specific ramp to answer his grievance. I don't</p> <p>19 think that's necessary.</p> <p>20 Q And do you see in this grievance he</p> <p>21 is complaining about being housed in RTU,</p> <p>22 Tier 3F?</p> <p>23 A In his grievance, it states that he's</p> <p>24 housed on 3F, yes.</p>	<p style="text-align: right;">Page 121</p> <p>1 have looked at the RTU corridor?</p> <p>2 A No, I don't need to look at the</p> <p>3 corridors as I mentioned before. There's no</p> <p>4 reason to go and look at the corridor or the</p> <p>5 ramps.</p> <p>6 Q Why not?</p> <p>7 A Because I'm familiar with the layout</p> <p>8 of the buildings.</p> <p>9 Q And would you agree this grievance</p> <p>10 identifies ramps in the RTU?</p> <p>11 A This grievance alleges that he</p> <p>12 encountered problems using his wheelchairs to</p> <p>13 go up and down several ramps.</p> <p>14 Q And does he identify specific</p> <p>15 locations of the incident?</p> <p>16 A He writes, and I think the grievance</p> <p>17 speaks for itself: On my way from RTU building</p> <p>18 to the court building, I encountered problems</p> <p>19 using my wheelchair going up and down several</p> <p>20 ramps. He does not specify the location of</p> <p>21 those ramps.</p> <p>22 Q But under required specific location</p> <p>23 of incident, does he provide additional</p> <p>24 information?</p>

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<p style="text-align: right;">Page 122</p> <p>1 A He writes the RTU building and the 2 court building. 3 Q And he also says halls, right? 4 A Next to that it says halls, yes. 5 Q Did you speak to Mr. Westmoreland 6 about this grievance when you were conducting 7 your investigation? 8 A As I have stated previously, it is my 9 practice to speak with inmates regarding their 10 grievances during my investigation of that 11 grievance. 12 Q And when you spoke with 13 Mr. Westmoreland, did you take any notes 14 regarding your conversations? 15 A No. I did not take any notes. 16 Q Do you see he identifies a specific 17 Officer Anderson not pushing him? 18 A He does. 19 Q Do you know Officer Anderson? 20 A I don't. 21 Q Is there usually one officer that 22 pushes or escorts a detainee from the RTU to 23 the Leighton courthouse? 24 A Is there usually? I don't know what</p>	<p style="text-align: right;">Page 124</p> <p>1 area of receiving to the court building. 2 Q Is receiving where some inmates are 3 held before going to court at Leighton? 4 A Receiving is an area in the Cook 5 County Jail where a lot of things occur, but 6 there are holding cells in receiving. 7 Q And are those holding cells at times 8 used for people who are being transitioned from 9 their housing division to Leighton courthouse? 10 A They are used for all types of 11 things. That could be one of them, yes. 12 Q Is there a Cook County court movement 13 team presently? 14 A There is no specific team dedicated 15 to court movement. Receiving handles most of 16 the movement and most of it is done on video as 17 we've already discussed. 18 Q Do you see this allegation that 19 Mr. Westmoreland says is the reason Officer 20 Anderson didn't push me is because he had 21 another wheelchair inmate who he pushed? 22 A That's his allegation in the 23 grievance, yes. 24 Q And, at times, you're aware that a</p>
<p style="text-align: right;">Page 123</p> <p>1 that means. There could be one officer. There 2 could be more than one officer conducting 3 movement. It just depends on the day. 4 Q Is it the same group of officers that 5 would escort the inmate from RTU to the 6 Leighton courthouse? 7 MR. DEVORE: Objection as to time 8 frame. 9 BY THE WITNESS: 10 A Yeah, so people were being escorted 11 every day to court. So would it be the exact 12 same officer every day, no. 13 BY MR. MORRISSEY: 14 Q During this time, was there a Cook 15 County court movement team? 16 A There may have been. I don't know 17 the time frame for the movement team, but they 18 didn't do the escorts from the RTU building to 19 the court building. 20 Q Where did they do escorts from? 21 A From receiving to the court building. 22 Q Is that like bullpen 34-5 by the 23 lunches? 24 A It's from receiving. It could be any</p>	<p style="text-align: right;">Page 125</p> <p>1 wheelchair is not pushed because the officer is 2 pushing another wheelchair user; is that fair? 3 A I mean, we reviewed a video of that 4 exact circumstance, did we not? So, yeah, 5 there could be times when an officer is 6 escorting more than one wheelchair. 7 Q When you conducted your investigation 8 about Mr. Westmoreland being moved to court on 9 August 10, 2021, do you know whether there was 10 one officer or more than one officers moving 11 Mr. Westmoreland? 12 A I don't recall. That was over two 13 years ago. 14 Q And you also see in this grievance he 15 complained about the restroom in the holding 16 cell? 17 A I could not use the restroom in the 18 holding cell. Yes. I don't know which holding 19 cell he's referring to, but yes. 20 Q Now I'm showing you Page 2 of 21 Exhibit 29 and it's your response that you 22 provided on August 20th, 2021. Do you see 23 that? 24 A I see that, yes.</p>

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<p style="text-align: right;">Page 126</p> <p>1 Q You write in part: Staff will be 2 reminded to document any refusals of assistance 3 while being transported via wheelchair? 4 A Correct. 5 Q How did you remind staff about that? 6 A As we previously discussed, if there 7 is a deviation in policy regarding escorting 8 wheelchairs, I will speak to the staff usually 9 verbally in person regarding that deviation. 10 Q Do you have any documentation about 11 speaking with any staff regarding deviation of 12 a policy? 13 A About this grievance, not that I 14 recall, no. 15 Q Over the last three years, do you 16 know the names of any staff members who 17 deviated from policy by not pushing a 18 wheelchair user? 19 MR. DEVORE: Objection, calls for 20 speculation. 21 BY THE WITNESS: 22 A No, I don't write down names of staff 23 members that deviate from policy. 24</p>	<p style="text-align: right;">Page 128</p> <p>1 not placed in a holding cell behind 304? 2 A Because I would have reviewed the 3 available video behind those holding cells, and 4 it's our policy to not place wheelchair users 5 in those holding cells. 6 Q You also mentioned: Nor were there 7 any injuries according to medical records. 8 Did you look at the medical records? 9 A As I've stated previously, I don't 10 look at medical records. I confer with the 11 medical providers. 12 Q Do you know which medical providers 13 you conferred with relating to this grievance 14 investigation? 15 A No, I don't recall. That was over 16 two years ago. 17 Q Do you have any idea what the medical 18 provider did to investigate whether there were 19 any injuries in the medical records? 20 A Well, I'm sure they would review the 21 medical records for any triage or examination 22 of the inmate's injuries. 23 Q Did they look at the Health Service 24 Request Forms?</p>
<p style="text-align: right;">Page 127</p> <p>1 BY MR. MORRISSEY: 2 Q Do you have the ability to discipline 3 staff members? 4 A Discipline occurs through the chain 5 of command. 6 Q Right. So do you have the ability to 7 discipline staff members? 8 A I'm outside of their chain of 9 command. 10 Q So is it your understanding that 11 Mr. Westmoreland refused assistance while being 12 transported in the tunnel system? 13 A That is my understanding and that 14 would be why I would write that staff will be 15 reminded to document refusals. 16 Q And you don't know whether there was 17 one officer escorting two wheelchair users to 18 court on the date Mr. Westmoreland complained 19 of problems moving up and down ramps? 20 A No. As I've already stated, that was 21 over two years ago. I don't remember how many 22 people were in the photo or videos that I may 23 have reviewed. 24 Q How do you know Mr. Westmoreland was</p>	<p style="text-align: right;">Page 129</p> <p>1 A The medical record would contain 2 Health Service Request Forms. 3 Q Who would you have gone to, the 4 dispensary doctor in the RTU? 5 A I think I already answered that. I 6 don't recall who I spoke to. This was over two 7 years ago. 8 Q And do you see Mr. Westmoreland 9 appealed this grievance and received a response 10 to his appeal? 11 A I do see that, yes. 12 Q Was there anything more 13 Mr. Westmoreland had to do to use the grievance 14 system to complain about the RTU ramps in this 15 grievance? 16 A I don't know what you mean by that 17 question. 18 Q Well, after he appealed this response 19 by you and received a response to his appeal by 20 Mr. Mueller, what else could he have done to 21 have his complaint be reviewed administratively 22 by the Sheriff's Office to your knowledge? 23 A Well, this would be an exhaustion of 24 the administrative remedies if he appealed this</p>

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<p>1 grievance and received a response to the</p> <p>2 appeal.</p> <p>3 Q So he exhausted about the RTU tunnels</p> <p>4 in this grievance?</p> <p>5 A Exhausted regarding the complaint in</p> <p>6 the grievance.</p> <p>7 Q And what was the complaint in the</p> <p>8 grievance?</p> <p>9 A I mean, Patrick, we're wasting time.</p> <p>10 You just showed it to me. So do you want me to</p> <p>11 read it into the record what it says. It's</p> <p>12 already an exhibit in this deposition.</p> <p>13 Q Well, would you agree that he</p> <p>14 complained about the RTU corridors in this</p> <p>15 grievance?</p> <p>16 A This grievance says on my way from</p> <p>17 the RTU building to the court building on</p> <p>18 8/10/21 between the hours of 9:00 a.m. and</p> <p>19 10:00 a.m., I encountered problems using my</p> <p>20 wheelchair going up and down several ramps.</p> <p>21 Now, I don't see the word corridor in</p> <p>22 this grievance, but you seem to be reading that</p> <p>23 into it.</p> <p>24 Q But earlier you said you didn't know</p>	<p>1 A No. No, Patrick, I didn't.</p> <p>2 Q Why didn't you say that in response</p> <p>3 to his grievance?</p> <p>4 A Because it wasn't relevant in my</p> <p>5 investigation or in my answer to the grievance.</p> <p>6 I answered it the way I answered it. The</p> <p>7 document speaks for itself.</p> <p>8 Q When you say that staff will be</p> <p>9 reminded to document any refusals of</p> <p>10 assistance, are you talking about assistance in</p> <p>11 the RTC to the courthouse?</p> <p>12 A I'm referring to our policy, which is</p> <p>13 to document refusals of assistance when a staff</p> <p>14 member attempts to assist an inmate in a</p> <p>15 wheelchair by pushing their chair. If they</p> <p>16 refuse, per policy, they should be documenting</p> <p>17 that as we've already discussed.</p> <p>18 Q Now, Ms. Rivero-Canchola, are there</p> <p>19 policies that you're required to follow as an</p> <p>20 employee of the Sheriff's Office?</p> <p>21 A You're asking me what policies I'm</p> <p>22 required to follow?</p> <p>23 Q No. I said are there policies?</p> <p>24 A Are there policies? Sure, yeah,</p>
Page 131	Page 133
<p>1 whether the RTU in the -- the lower level of</p> <p>2 the RTU has ramps, right? So I'm trying to use</p> <p>3 the word you've used in this deposition about</p> <p>4 whether the ramps are corridors, okay?</p> <p>5 A Yeah, but that's not -- you're asking</p> <p>6 me a question about the grievance, not about my</p> <p>7 previous testimony. You asked me if he wrote a</p> <p>8 grievance about the corridor, and this</p> <p>9 grievance doesn't say anything about corridors.</p> <p>10 Q Does this grievance address the RTU</p> <p>11 ramp?</p> <p>12 A This grievance makes allegations</p> <p>13 about him having difficulties or encountering</p> <p>14 problems going up and down several ramps. I</p> <p>15 think it speaks for itself as to what it says.</p> <p>16 Q And based on your investigation, was</p> <p>17 one of the ramps that he alleged the RTU ramp?</p> <p>18 A Again, Patrick, the RTU doesn't have</p> <p>19 ramps because the RTU is from second floor to</p> <p>20 the fifth floor. So the RTU doesn't have a</p> <p>21 ramp. So you're trying to define something</p> <p>22 that in my opinion doesn't exist.</p> <p>23 Q Did you tell Mr. Westmoreland that</p> <p>24 there are no ramps in the RTU?</p>	<p>1 there's policies.</p> <p>2 Q And is one of the policies Policy 801</p> <p>3 titled Disabilities of Individuals Determined</p> <p>4 in the Department?</p> <p>5 A There's a lot of policies, but I'm</p> <p>6 sure that's probably one of them. If you are</p> <p>7 referring me to a document that you want to</p> <p>8 show.</p> <p>9 Q All right. I will show you the</p> <p>10 document, but my preliminary question: Did you</p> <p>11 review any policies, written policies, in</p> <p>12 preparation for your deposition today?</p> <p>13 A I did not.</p> <p>14 Q I will show you Exhibit 38.</p> <p>15 Exhibit 38 is coming up. Do you see Policy 801</p> <p>16 in front of you, Ms. Rivero-Canchola?</p> <p>17 A I do see Policy 801, yes.</p> <p>18 Q And are you familiar with this</p> <p>19 policy?</p> <p>20 A I am familiar with that policy, yes.</p> <p>21 Q And do you see 801.3, it says:</p> <p>22 Executive Director Responsibilities?</p> <p>23 A It does, yes.</p> <p>24 Q And it says: The executive director</p>

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35 (Pages 134 to 137)

<p style="text-align: right;">Page 134</p> <p>1 or authorized designee, in coordination with</p> <p>2 the responsible physician and the ADA</p> <p>3 coordinator, will establish procedures to</p> <p>4 assess and reasonably accommodate disabilities</p> <p>5 of individuals detained in the department?</p> <p>6 A Yes.</p> <p>7 Q Who is the responsible physician?</p> <p>8 A I don't know what physician this is</p> <p>9 referring to; but as you're aware that Cermak</p> <p>10 does have a physician that leads their</p> <p>11 department.</p> <p>12 Q Is there somebody that you work with</p> <p>13 that's known as the responsible physician that</p> <p>14 you work with to establish accommodations for</p> <p>15 people?</p> <p>16 A To my knowledge, no one holds that</p> <p>17 specific title in Cermak, but I work with</p> <p>18 all -- a lot of the physicians at Cermak?</p> <p>19 Q And do you work directly with the</p> <p>20 executive director or has there been somebody</p> <p>21 authorized by the executive director that you</p> <p>22 work with?</p> <p>23 A I work with everyone in the Sheriff's</p> <p>24 Office.</p>	<p style="text-align: right;">Page 136</p> <p>1 criteria, no.</p> <p>2 Q Have you worked with the responsible</p> <p>3 physician and/or the executive director to do</p> <p>4 that?</p> <p>5 A I don't understand your question.</p> <p>6 These are overall general responsibilities</p> <p>7 within a policy, and they could mean different</p> <p>8 things on different days. So, yeah, we all</p> <p>9 have a role in making sure that we accommodate</p> <p>10 inmates with disabilities in our custody as</p> <p>11 defined by this policy. But do I specifically</p> <p>12 set that criteria, which is what you're asking,</p> <p>13 no, I do not.</p> <p>14 Q Well, tell me working with the other</p> <p>15 stakeholders, tell me what you have done to</p> <p>16 establish classification criteria to make</p> <p>17 housing assignments for individuals with</p> <p>18 disabilities?</p> <p>19 A As I stated at the beginning of this</p> <p>20 deposition, my role as ADA compliance officer</p> <p>21 is to make sure that the office complies with</p> <p>22 the Americans with Disabilities Act and all</p> <p>23 that entails. So what that may look like on</p> <p>24 one day to the next, on one situation to the</p>
<p style="text-align: right;">Page 135</p> <p>1 Q The question is about the executive</p> <p>2 director. Do you work with the executive</p> <p>3 director regarding establishing procedures to</p> <p>4 help or accommodate disabled people or do you</p> <p>5 work with designee?</p> <p>6 A It depends on the situation and the</p> <p>7 specific issue that we're discussing. So as</p> <p>8 you can see from this policy, the executive</p> <p>9 director has certain responsibilities. And at</p> <p>10 times, that could be working with me and</p> <p>11 someone from Cermak to assess and reasonably</p> <p>12 accommodate inmates with disabilities that are</p> <p>13 in our custody. I think the document speaks</p> <p>14 for itself.</p> <p>15 Q And pursuant to this policy, have you</p> <p>16 established housing areas that are equipped to</p> <p>17 meet the needs of physically disabled</p> <p>18 detainees?</p> <p>19 A No.</p> <p>20 Q Have you -- pursuant to this policy,</p> <p>21 have you established classification criteria to</p> <p>22 make housing assignments to individuals with</p> <p>23 disabilities?</p> <p>24 A Have I established classification</p>	<p style="text-align: right;">Page 137</p> <p>1 next, it varies. And you're asking a very</p> <p>2 broad question that I am having difficulty</p> <p>3 answering.</p> <p>4 Q Tell me the different locations at</p> <p>5 the Cook County Jail where somebody with a</p> <p>6 wheelchair alert may be housed?</p> <p>7 A It depends on the type of wheelchair</p> <p>8 alert, and it depends on the inmate's medical</p> <p>9 status assigned to them by Cermak.</p> <p>10 Q Can you tell me the different</p> <p>11 locations where the person could be housed?</p> <p>12 A It depends on the wheelchair alert</p> <p>13 and the medical level assigned to them by</p> <p>14 Cermak. They could be assigned anywhere.</p> <p>15 Especially if they have a long distance</p> <p>16 wheelchair alert, they could be assigned to any</p> <p>17 division depending on the classification</p> <p>18 assigned to them by Cermak.</p> <p>19 Q And you're aware that none of the</p> <p>20 divisions other than RTU and Cermak have</p> <p>21 accessible housing that meet the 2010 design</p> <p>22 standards?</p> <p>23 A Is that a legal conclusion that</p> <p>24 you're trying to get me to make?</p>

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36 (Pages 138 to 141)

<p style="text-align: right;">Page 138</p> <p>1 Q Well, you wrote that business case, 2 right, and we read this at the -- I'm trying to 3 make this quicker. If you want me to pull up 4 your business case, I can. But you wrote the 5 business case saying that only Cermak and the 6 RTU meet the accessible standards for the 2010 7 design standards, right?</p> <p>8 A In my opinion, yes. Those are the 9 only buildings that are designed to meet the 10 2010 standards. That doesn't mean that those 11 were the standards that were applicable at the 12 time the buildings were constructed or 13 designed.</p> <p>14 Q Well, then why would people who use 15 wheelchairs for long distance be housed in 16 Division 10 or Division 6?</p> <p>17 MR. DEVORE: Objection, calls for 18 speculation.</p> <p>19 BY THE WITNESS:</p> <p>20 A I mean, that depends on the 21 individual's abilities, Patrick. I know that 22 you often like to think that auxiliary aid 23 automatically means a person is disabled and in 24 need of accessibility in their housing, and</p>	<p style="text-align: right;">Page 140</p> <p>1 Q How would the guards that are within 2 the chain of command, how would they know the 3 abilities or disabilities of a detainee who has 4 a mobility impairment that a doctor determines 5 should use a cane, crutch or walker?</p> <p>6 A Well, first of all, we don't have 7 guards. We have correctional officers that are 8 deputy sheriffs, and they follow the alerts 9 that are in the jail management system and that 10 gives them guidance on how to deal with the 11 inmates that are in their custody.</p> <p>12 Q Well, how could a correctional 13 officer accommodate somebody with a walker go 14 up or down the RTU ramp?</p> <p>15 MR. DEVORE: Objection, vague.</p> <p>16 BY THE WITNESS:</p> <p>17 A That's an incomplete hypothetical. 18 So it depends on the situation. I don't know 19 how to answer that without more information. I 20 can't answer your incomplete hypotheticals 21 without more information.</p> <p>22 BY MR. MORRISSEY:</p> <p>23 Q So the person -- let's say the person 24 has an alert for a walker, Ms. Rivero-Canchola,</p>
<p style="text-align: right;">Page 139</p> <p>1 that's not how things work here. So every 2 inmate has different abilities. And when they 3 get assessed by the medical provider at that 4 time, they are assigned a level of housing and 5 we house them based on that level of housing.</p> <p>6 Q How would a guard provide 7 accommodations to somebody with those 8 conditions.</p> <p>9 MR. DEVORE: Objection, calls for 10 speculation.</p> <p>11 BY THE WITNESS:</p> <p>12 A With what conditions? I don't know 13 what hypothetical you're trying to provide.</p> <p>14 BY MR. MORRISSEY:</p> <p>15 Q Somebody who has a mobility 16 limitation, Ms. Rivero-Canchola, how would the 17 guard know what accommodations would be 18 required under the law for the person who has 19 to go up or down a ramp?</p> <p>20 A What kind of mobility limitation? 21 Each inmate has different abilities and 22 disabilities. So mobility limitations vary 23 from one person to the next. I don't know how 24 to answer the question.</p>	<p style="text-align: right;">Page 141</p> <p>1 tell me what accommodations a correctional 2 officer has available at his or her disposal to 3 accommodate that person who needs a walker to 4 go up or down the RTU corridor that's going 5 east/west?</p> <p>6 A But your question assumes they need 7 some sort of accommodation to go through that 8 corridor because you're making that assumption 9 because they may very well may not need an 10 accommodation. So why would an officer assume 11 that they need one?</p> <p>12 Q Well, assuming the person needs an 13 accommodation, what is available to a 14 correctional officer to assist a person with a 15 walker to traverse up and down that east 16 corridor?</p> <p>17 A Again, that is situation specific to 18 the needs of the inmate and what is existing at 19 the time. So I cannot answer your incomplete 20 hypotheticals appropriately because they don't 21 give me enough information to provide a 22 complete answer.</p> <p>23 Q Well, you're aware that the RTU ramp 24 didn't used to have handrails, right?</p>

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37 (Pages 142 to 145)

<p style="text-align: right;">Page 142</p> <p>1 A No, I'm not aware of that.</p> <p>2 Q Excuse me. On the Cermak ramp.</p> <p>3 You're aware that handrails were recently</p> <p>4 installed within the last year, right?</p> <p>5 A It has handrails that were recently</p> <p>6 installed, yes, new ones, but there were</p> <p>7 existing rails along the side of the Cermak</p> <p>8 ramp.</p> <p>9 Q So before those handrails were</p> <p>10 recently installed, what accommodations did</p> <p>11 staff members provide people with mobility</p> <p>12 impairments to go up and down the Cermak ramp?</p> <p>13 A I don't know how to answer your</p> <p>14 question because it makes several assumptions.</p> <p>15 First, it assumes that the rail that was there</p> <p>16 before wasn't a handrail and that this one is</p> <p>17 brand new. And second, it assumes that they</p> <p>18 needed some sort of accommodation to go up and</p> <p>19 down that ramp. I can't answer your incomplete</p> <p>20 hypothetical.</p> <p>21 Q So if a person with a mobility</p> <p>22 impairment needs an accommodation to traverse a</p> <p>23 ramp or a corridor, is it incumbent on the</p> <p>24 detainee to request help from the correctional</p>	<p style="text-align: right;">Page 144</p> <p>1 call a paramedic or a nurse to assist. I mean,</p> <p>2 I can't go through all the possible</p> <p>3 hypotheticals that can exist in that situation.</p> <p>4 Q So one method could be a wheelchair</p> <p>5 could be available upon request for an inmate</p> <p>6 to go up or down a corridor or a ramp, right?</p> <p>7 A If needed, sure. They could provide</p> <p>8 a wheelchair if available and if needed.</p> <p>9 Q And that wouldn't be difficult for</p> <p>10 the Sheriff's Office to do?</p> <p>11 A I'm not going to speculate on the</p> <p>12 difficulties in an unknown situation and</p> <p>13 incomplete hypothetical that you're providing</p> <p>14 me.</p> <p>15 Q What about -- you mentioned there's a</p> <p>16 cart, right? That inmate could be assisted up</p> <p>17 or down a ramp or a corridor?</p> <p>18 A Sometimes. Sometimes officers from</p> <p>19 divisions that are far away would bring a</p> <p>20 Cushman Cart along with them but not always.</p> <p>21 Q Could that accommodate a wheelchair?</p> <p>22 A I don't know what you mean by that.</p> <p>23 Q Does the Cushman -- how do you say</p> <p>24 the cart's name?</p>
<p style="text-align: right;">Page 143</p> <p>1 officer?</p> <p>2 A If the need isn't readily apparent</p> <p>3 that they cannot go up or down that corridor,</p> <p>4 yes, then it would be on the inmate to request</p> <p>5 what assistance they need if it's not readily</p> <p>6 apparent.</p> <p>7 Now each inmate gets assessed by</p> <p>8 Cermak for what their needs are when it comes</p> <p>9 to auxiliary aids, mobility aids to impairment.</p> <p>10 So if they needed something more than what they</p> <p>11 had, then Cermak would have gave them that.</p> <p>12 That's not a correctional officer duty to make</p> <p>13 the conclusion on whether an inmate needs a</p> <p>14 specific mobility aid.</p> <p>15 Q So, let's say, an inmate with a</p> <p>16 walker was going up the Cermak ramp and this</p> <p>17 was before the handrails were recently</p> <p>18 installed, if the inmate asked for assistance</p> <p>19 from the officer, what types of assistance</p> <p>20 would be available for the officer to help the</p> <p>21 inmate traverse the ramp?</p> <p>22 A It's situation specific. So it could</p> <p>23 be a wheelchair, maybe we take another path,</p> <p>24 maybe they take the Cushman Cart, maybe they</p>	<p style="text-align: right;">Page 145</p> <p>1 A It's Cushman Cart but you weren't</p> <p>2 asking me about an inmate in a wheelchair. You</p> <p>3 asked me about an inmate with a walker that</p> <p>4 walks up and down the ramps. So now you're</p> <p>5 changing the context of your incomplete</p> <p>6 hypothetical.</p> <p>7 Q So we'll talk about a cane or --</p> <p>8 let's talk about a walker. An officer could</p> <p>9 have an inmate use a cart to get -- a motorized</p> <p>10 cart to go up or down a ramp or a corridor,</p> <p>11 correct?</p> <p>12 A Possibly, if one is available; but as</p> <p>13 I already stated, one might not be available.</p> <p>14 It's not available to every officer.</p> <p>15 Q Do the officers have instructions</p> <p>16 that they are allowed to use the cart to help</p> <p>17 escort an inmate up and down a ramp or a</p> <p>18 corridor?</p> <p>19 A No. They do not have specific</p> <p>20 instructions regarding Cushman Carts.</p> <p>21 Q How about using a wheelchair for</p> <p>22 somebody who uses a walker, do they have</p> <p>23 instructions about using that to traverse a</p> <p>24 ramp or corridor?</p>

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38 (Pages 146 to 149)

<p style="text-align: right;">Page 146</p> <p>1 A I believe our policy provides 2 guidelines on the different types of 3 accommodations that can be provided. So if you 4 want to call that instructions, fine, 5 instructions, policy, guidelines. 6 Q How about for wheelchair users, are 7 there carts that you could put a wheelchair 8 user on to traverse up and down ramps or 9 corridors? 10 A I'm not aware of any carts that you 11 could put a wheelchair on. 12 Q Have you ever -- do you have personal 13 knowledge about a cart ever being used to help 14 a person with crutches or a cane go up and down 15 a ramp? 16 A I have seen officers use Cushman 17 Carts for a variety of reasons including 18 transporting inmates from other divisions that 19 may have assistive devices and some who do not 20 have assistive devices. 21 Q So it's feasible to do that? 22 A As I have already stated, that is 23 situation dependent because not every officer 24 has access to a Cushman Cart, not every</p>	<p style="text-align: right;">Page 148</p> <p>1 staff member reached out to you for guidance 2 about the types of accommodations that they 3 could provide to somebody who uses a cane or a 4 walker, what would you tell the officer? 5 A It depends on the situation that 6 they're describing. 7 Q Going up a ramp. 8 MR. DEVORE: Objection. I don't know 9 how many times you've asked the same line 10 of questioning, but I think it's been five. 11 BY THE WITNESS: 12 A There's different kinds of 13 accommodations, Patrick. Again, I can't 14 speculate on all the different hypothetical 15 situations that could present themselves at the 16 jail. So that type of accommodation could look 17 different from one situation to the next. 18 BY MR. MORRISSEY: 19 Q Have you ever given advise to a staff 20 member about the different accommodations that 21 are available? 22 A Absolutely. 23 Q And you don't -- you can't recall 24 what you told the staff member?</p>
<p style="text-align: right;">Page 147</p> <p>1 division has access to a Cushman Cart and one 2 is not available in every single situation. 3 So I can't appropriately answer your 4 incomplete hypothetical. 5 Q So how do inmates know they have 6 access to all of these resources or all of 7 these accommodations? 8 A The Inmate Handbook provides 9 information about how an officer could contact 10 the ADA compliance officer, being me, if they 11 need information about the accommodations that 12 are available to them while they are in our 13 custody. 14 Q But is there anything near the ramp 15 that says there are a host of accommodations 16 that can be provided to help somebody up and 17 down a ramp or a corridor? 18 A I think as we've previously 19 discussed, there's a bunch of different signs 20 in our facility, some which say don't proceed 21 up the ramp without assistance. But is there a 22 list on the ramp of the types of accommodations 23 that can be provided, no. 24 Q So if somebody reached out to you, a</p>	<p style="text-align: right;">Page 149</p> <p>1 A I mean, I tell them all sorts of 2 things, especially during my training. But am 3 I recalling a specific instance of that, no. 4 Q Now, Ms. Rivero-Canchola, do you 5 remember e-mails you received about the RTU 6 ramp perhaps not being compliant with the ADA? 7 A As I discussed at the beginning of 8 this deposition, I did review some e-mails from 9 TJ Tyrrell and some other members within Cook 10 County regarding several different ramps. I 11 think just the Cermak ramp was the primary ramp 12 represented in those e-mails. 13 Q But wasn't one ramp discussing the 14 RTU ramp? 15 A The what? 16 Q One of the e-mails mentions the RTU 17 ramp, right? 18 A I think as I've already stated, it's 19 my opinion that there are no RTU ramps because 20 there couldn't possibly be a ramp that went all 21 the way up to the second floor of the building. 22 So is it referenced somewhere in an e-mail that 23 someone is referring to this RTU ramp, I 24 believe that it is. And if you would like to</p>

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<p style="text-align: right;">Page 150</p> <p>1 put the exhibit up so we can specifically</p> <p>2 discuss that, then fine, but I'm not going to</p> <p>3 use that language because I don't believe there</p> <p>4 is a ramp in RTU.</p> <p>5 Q Has your understanding changed in the</p> <p>6 last three years?</p> <p>7 A My understanding of what?</p> <p>8 Q About whether there was a ramp in the</p> <p>9 RTU because a couple of years ago, you said</p> <p>10 that there was a ramp in the RTU in an e-mail.</p> <p>11 A Again, Patrick, the RTU is the second</p> <p>12 floor through the fifth floor of that building.</p> <p>13 The basement and first floor is Receiving,</p> <p>14 Trust and Classification. So maybe I was just</p> <p>15 using the language that was already in the</p> <p>16 e-mail, but there are no ramps in RTU because</p> <p>17 RTU begins on the second floor of that</p> <p>18 building.</p> <p>19 Q Are there ramps in the RTC?</p> <p>20 A Yes. There are ramps in the RTC.</p> <p>21 Q How many ramps are there in the RTC?</p> <p>22 A You asked me this already. I haven't</p> <p>23 counted them. I don't know.</p> <p>24 Q And other than the east/west and the</p>	<p style="text-align: right;">Page 152</p> <p>1 sure if that was required at the time it was</p> <p>2 built. Zach, can you clarify what you need?</p> <p>3 Either way I think it's good to have the</p> <p>4 measurements of the RTU basement ramp as well.</p> <p>5 Is that your word?</p> <p>6 A That is my word there because if you</p> <p>7 look through that chain of e-mails that you're</p> <p>8 presenting one page of, that is the language</p> <p>9 that was being used.</p> <p>10 Q Do some people call the basement of</p> <p>11 the RTU the RTU?</p> <p>12 A I mean, you are. So you're some</p> <p>13 people, so I guess so.</p> <p>14 Q And when you're referencing landings,</p> <p>15 what are you talking about in this e-mail?</p> <p>16 A A flat surface at the base or the top</p> <p>17 of a ramp.</p> <p>18 Q Do you know whether the RTC ramp, any</p> <p>19 of the RTC ramps have landings?</p> <p>20 A I think they do.</p> <p>21 Q Which ones have landings?</p> <p>22 A I don't know. I haven't inspected</p> <p>23 them or measured them.</p> <p>24 Q And do you have any idea how long the</p>
<p style="text-align: right;">Page 151</p> <p>1 north/south corridor, where else are there</p> <p>2 ramps in the RTC?</p> <p>3 A I don't know. I didn't count them.</p> <p>4 Q Do you know generally where other</p> <p>5 ramps are in the RTC?</p> <p>6 MR. DEVORE: Objection. She's</p> <p>7 testified to this.</p> <p>8 BY THE WITNESS:</p> <p>9 A No, Patrick. Sorry. I can't recount</p> <p>10 every single ramp in this tunnel system that we</p> <p>11 have.</p> <p>12 BY MR. MORRISSEY:</p> <p>13 Q I'm going to show you Exhibit 23. Do</p> <p>14 you see this e-mail, 23, Page 1?</p> <p>15 A Yes.</p> <p>16 Q And I'm going to go to another page.</p> <p>17 I think it's the second. The second page is an</p> <p>18 e-mail from you dated March 9th, 2021 at</p> <p>19 2:00 p.m. Do you see that?</p> <p>20 A Yes.</p> <p>21 Q And it says: I believe the</p> <p>22 litigation in question is asking about the old</p> <p>23 ramp outside the Cermak basement entrance. I</p> <p>24 don't believe it has any landings, but I'm not</p>	<p style="text-align: right;">Page 153</p> <p>1 landing has to be?</p> <p>2 A According to who?</p> <p>3 Q According to the ADA, the 2010 ADA?</p> <p>4 A So that would depend on when the</p> <p>5 building was built. It has -- there are</p> <p>6 different standards as you're aware. There's</p> <p>7 the Illinois Accessibility Code, there's the</p> <p>8 current standards. It all depends on the</p> <p>9 building that we're talking about and the</p> <p>10 applicable standard.</p> <p>11 Q Why did you say it's a good idea to</p> <p>12 have measurements of the RTU basement ramp as</p> <p>13 well?</p> <p>14 A I don't know. It's within the</p> <p>15 context of this conversation that we're having,</p> <p>16 Patrick, and the e-mail. I think you can see</p> <p>17 the entire thing.</p> <p>18 Q After you wrote this e-mail in March</p> <p>19 of 2021, do you know whether anybody measured</p> <p>20 the RTU -- or the RTC ramps?</p> <p>21 A I'm not sure if anyone has measured</p> <p>22 the RTC ramps. I don't recall.</p> <p>23 Q Anything refresh your memory?</p> <p>24 A No. No.</p>

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40 (Pages 154 to 157)

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<p>1 Q How many people presently are in the</p> <p>2 RTU that use wheelchairs full time?</p> <p>3 A I don't know.</p> <p>4 Q Do you have any idea?</p> <p>5 A Isn't that what I don't know means?</p> <p>6 No. I don't count them.</p> <p>7 Q Are there more than two people that</p> <p>8 use wheelchairs?</p> <p>9 A There could be.</p> <p>10 Q When is the last time you did a</p> <p>11 census of how many wheelchair users are housed</p> <p>12 in the RTU?</p> <p>13 A A census? I don't know what you mean</p> <p>14 by that.</p> <p>15 Q When is the last time you counted the</p> <p>16 number of wheelchair users in the RTU?</p> <p>17 A I don't count the number of</p> <p>18 wheelchair users in a given division, Patrick.</p> <p>19 So I don't know.</p> <p>20 Q In the last two users, do you know</p> <p>21 how many wheelchair users have been housed in</p> <p>22 the RTU?</p> <p>23 A No.</p> <p>24 Q Do you have any idea?</p>	<p>1 wheelchair users have gone up or down the RTC</p> <p>2 ramps in the last two years?</p> <p>3 A No.</p> <p>4 Q Would it be under 10?</p> <p>5 A I don't know. That's what I don't</p> <p>6 know means.</p> <p>7 Q How would you identify how many</p> <p>8 wheelchair users have been housed in the RTU</p> <p>9 over the last two years?</p> <p>10 A How would I identify them? I would</p> <p>11 not be able to identify how many inmates are</p> <p>12 housed using wheelchairs in RTU in past years.</p> <p>13 Q Do you know whether anybody within</p> <p>14 the Sheriff's Office could do that?</p> <p>15 A I'm sure someone would have the</p> <p>16 ability to pool past data, but that would not</p> <p>17 be me.</p> <p>18 Q Now, do you know Officer Marin?</p> <p>19 A I do know Officer Marin, yes.</p> <p>20 Q What is Officer Marin's first name?</p> <p>21 A I believe it's George.</p> <p>22 Q Have you trained Officer Marin</p> <p>23 regarding the ADA?</p> <p>24 A I mean, I don't recall specifically</p>
Page 155	Page 157
<p>1 A No.</p> <p>2 Q Is it -- is it rare for there to be</p> <p>3 10 wheelchair users housed in the RTU at any</p> <p>4 given period of time?</p> <p>5 A Is it rare?</p> <p>6 Q Right.</p> <p>7 MR. DEVORE: Objection, vague.</p> <p>8 BY THE WITNESS:</p> <p>9 A I don't know. I haven't -- again, I</p> <p>10 have not counted the number of wheelchairs in</p> <p>11 RTU. So I'm not going to comment on the rarity</p> <p>12 of that circumstance.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Did you review the interrogatory</p> <p>15 answers by the Sheriff's Office in this case</p> <p>16 about the number of wheelchair users that were</p> <p>17 housed in the RTU at a given point in time?</p> <p>18 A I don't recall an RTA about that.</p> <p>19 The RTAs that I recall were about the buildings</p> <p>20 and the structures.</p> <p>21 Q What about an interrogatory answer?</p> <p>22 A No, I didn't review any</p> <p>23 interrogatories.</p> <p>24 Q Do you know how many different</p>	<p>1 training him, but as we have already covered, I</p> <p>2 train all new members of the Cook County</p> <p>3 Sheriff's Department beginning in September of</p> <p>4 2015, and they also receive ADA online learning</p> <p>5 management training.</p> <p>6 Q Do you know whether Officer Marin</p> <p>7 started working as a correctional officer after</p> <p>8 2015?</p> <p>9 A I have no idea when he started</p> <p>10 working as a correctional officer.</p> <p>11 Q And if he started working before</p> <p>12 2015, he wouldn't have been trained during</p> <p>13 orientation by you, correct?</p> <p>14 A He wouldn't have been trained by me,</p> <p>15 correct, but he would have been trained by</p> <p>16 someone else.</p> <p>17 Q Now, when Eugene Westmoreland went to</p> <p>18 vote on February 18, 2023, do you know the path</p> <p>19 of travel he took from RTU to Division 4?</p> <p>20 A Do I know the path of travel? No, I</p> <p>21 don't remember observing his path of travel</p> <p>22 from RTU to Division 4.</p> <p>23 Q Well, did you ask Officer Marin which</p> <p>24 way he took to escort Mr. Westmoreland from RTU</p>

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<p style="text-align: right;">Page 158</p> <p>1 to Division 4 to vote?</p> <p>2 A No.</p> <p>3 Q Why not?</p> <p>4 A Because that wasn't the allegations</p> <p>5 contained in Mr. Westmoreland's grievance. It</p> <p>6 wasn't about the path of travel from RTU to</p> <p>7 Division 4 that I recall.</p> <p>8 Q When Mr. Westmoreland went to vote on</p> <p>9 February 18, 2023, was he being escorted with</p> <p>10 other detainees by Officer Marin?</p> <p>11 A I believe he was being escorted with</p> <p>12 multiple detainees that day, yes.</p> <p>13 Q And how many officers were with</p> <p>14 Officer Marin escorting these detainees to</p> <p>15 vote?</p> <p>16 A I'm not sure.</p> <p>17 Q Do you know whether Officer Marin was</p> <p>18 the only officer escorting these detainees?</p> <p>19 A He may have been. I'm not sure.</p> <p>20 Q And when Mr. Westmoreland was being</p> <p>21 escorted to vote and back, was he being</p> <p>22 escorted with more than one wheelchair user?</p> <p>23 A Possibly.</p> <p>24 Q Why would more than one wheelchair</p>	<p style="text-align: right;">Page 160</p> <p>1 I said, I'm not sure if there was more than one</p> <p>2 wheelchair in that group. I don't recall.</p> <p>3 Q Well, when you spoke -- did you speak</p> <p>4 to Officer Marin about his movement of</p> <p>5 Mr. Westmoreland to vote?</p> <p>6 A Yes. I spoke with him about</p> <p>7 Mr. Westmoreland and the allegations contained</p> <p>8 in the grievance, not about any other inmate.</p> <p>9 Q And what did Officer Marin say to</p> <p>10 you?</p> <p>11 A He said what's reflected in the</p> <p>12 e-mail that he sent me, which was tendered in</p> <p>13 this case.</p> <p>14 Q Why -- did you ask Officer Marin why</p> <p>15 he wasn't pushing Mr. Westmoreland that day?</p> <p>16 A I don't know if I asked him that</p> <p>17 specific question. I mean, there was another</p> <p>18 inmate pushing Mr. Westmoreland and Officer</p> <p>19 Marin was doing mass movement of inmates. So I</p> <p>20 know from a safety and security perspective,</p> <p>21 when you're moving more than one inmate, you</p> <p>22 like to keep your hands free.</p> <p>23 Q So did Officer Marin deviate from</p> <p>24 Sheriff policy on the date that Eugene</p>
<p style="text-align: right;">Page 159</p> <p>1 user be escorted with an officer at one time?</p> <p>2 A I think we already covered this. You</p> <p>3 asked this already. So officers have to do</p> <p>4 mass movement of inmates at times. So that may</p> <p>5 mean escorting one or more inmates that are in</p> <p>6 a wheelchair or more than one inmates who are</p> <p>7 walking without a wheelchair.</p> <p>8 Q When you use the term "mass</p> <p>9 movement," are you talking about one officer</p> <p>10 moving more than one inmate at a time?</p> <p>11 A When I use the term mass movement,</p> <p>12 I'm saying moving more than one inmate. I'm</p> <p>13 not making a determination how many officers</p> <p>14 are moving that group of inmates.</p> <p>15 Q So when Mr. Westmoreland was being</p> <p>16 moved to Division 4 to vote with more than one</p> <p>17 wheelchair user, explain how Officer Marin was</p> <p>18 supposed to push all the wheelchair users?</p> <p>19 A What? Can you rephrase your</p> <p>20 question?</p> <p>21 Q Right. Officer Marin escorted</p> <p>22 Mr. Westmoreland along with some other</p> <p>23 wheelchair users to vote, right?</p> <p>24 A I don't know. Is that a fact? Like</p>	<p style="text-align: right;">Page 161</p> <p>1 Westmoreland was brought to Division 4 to vote?</p> <p>2 A Deviate how?</p> <p>3 Q Well, you previously said staff are</p> <p>4 required to push inmates up and down ramps at</p> <p>5 the Cook County Jail, right?</p> <p>6 A I think that mischaracterizes my</p> <p>7 previous testimony. But Officer Marin provided</p> <p>8 accommodations to Westmoreland via the other</p> <p>9 inmate who was assisting Westmoreland in that</p> <p>10 wheelchair, and I do not have personal knowledge</p> <p>11 as to whether that was Mr. Westmoreland's</p> <p>12 request that he be pushed by another inmate and</p> <p>13 not Officer Marin. I'm not going to speculate</p> <p>14 on that, but Mr. Westmoreland was assisted,</p> <p>15 which is the Sheriff's Office policy.</p> <p>16 MR. DEVORE: And your question</p> <p>17 regarding the office policy does call for</p> <p>18 speculation as noted by the witness.</p> <p>19 BY MR. MORRISSEY:</p> <p>20 Q I'm going to show you Exhibit [sic] 148.</p> <p>21 Exhibit 148 is titled: Communication and</p> <p>22 Interaction with Individuals with Disabilities.</p> <p>23 Do you see this, Ms. Rivero-Canchola?</p> <p>24 A I do, yes.</p>

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<p>1 Q Is this policy applicable at the 2 Department of Corrections? 3 A We have multiple policies, and the 4 numbers have changed over time. So I'm not 5 sure if that one is the correct policy number 6 at this time; but at one point, yes, it has 7 been the policy. 8 Q And if we go down to -- let me get 9 the right page here. If we go down to Page 259 10 of the policy document -- do you see on Page 258, 11 it says: 148.6.8 Arrests, Bookings, Court 12 Remands and Court Appearances? 13 A I see that. 14 Q And do you say -- do you see where it 15 says: Absent specific and articulable safety 16 or security concerns, members shall provide 17 assistance to wheelchair-bound subjects who are 18 in the Sheriff's Office custody. This includes 19 but is not limited to: Pushing subjects up and 20 down ramps throughout corridors in Sheriff's 21 Office facilities? 22 A It does say that, yes. 23 Q Was this language implemented because 24 of the Lacy litigation?</p>	<p>1 escorted him to Division 4, I could say he had 2 a specific and articulable safety or security 3 concern that he would say why he didn't 4 personally push Westmoreland or maybe there 5 were other reasons. I'm not going to speculate 6 on that, but he was doing mass movement, and my 7 preference is that they keep their hands free 8 when they are doing mass movements. 9 Q Did Officer Marin say that's why he 10 didn't push Mr. Westmoreland up and down ramps 11 and through the corridors when he voted? 12 A Marin said what is contained in the 13 e-mail that he sent me that was tendered in 14 this case, which is why I had him send the 15 e-mail so we would have a clear record of what 16 it was that he conveyed to me that day. 17 Q Well, my question is at any point, 18 did he tell you any specific and articulable 19 safety or security concern why he didn't push 20 Westmoreland? 21 A Well, your question assumes that I 22 would have asked that, and the allegation 23 contained in the grievance wasn't about who was 24 doing the pushing. It was about the fall.</p>
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<p>1 MR. DEVORE: Objection, calls for 2 speculation. 3 BY THE WITNESS: 4 A So Lacy litigation commenced before 5 my employment as ADA compliance officer, but I 6 believe that some of our policies were crafted 7 to address that, but some of our policies were 8 crafted to address DOJ concerns and other 9 matters of the Sheriff's Office. 10 BY MR. MORRISSEY: 11 Q And so this -- is this policy in 12 effect today that staff members shall push 13 subjects up and down ramps and through 14 corridors in Sheriff's Office facilities? 15 A So I think the document speaks for 16 itself, and that portion that you read says 17 absent specific and articulable safety or 18 security concerns, members shall provide 19 assistance to wheelchair-bound subjects and 20 then gives examples of what that assistance 21 could include. And since we are hopefully 22 talking about Westmoreland, which we've spent a 23 lot of time not talking about Westmoreland, 24 that assistance at that day that Officer Marin</p>	<p>1 Q Now, have you given training to staff 2 about using inmates to push wheelchairs 3 throughout the DOC compound? 4 A What? 5 Q Have you given direction to 6 correctional officers about circumstances when 7 the correctional officer should ask other 8 inmates to push a wheelchair user up and down 9 ramps and in corridors? 10 A Again -- 11 MR. DEVORE: Objection, form, already 12 testified. 13 But go ahead. 14 BY THE WITNESS: 15 A Yeah, I don't know how to more 16 thoroughly answer this. I provide training to 17 all of our new employees regarding 18 accommodating inmates with disabilities. 19 Sometimes we address hypothetical situations. 20 It could include mass movement like that, but 21 it can include other things too. 22 Q So do you have any specific 23 recollection about providing training to staff 24 about having other inmates push wheelchairs?</p>

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<p style="text-align: right;">Page 166</p> <p>1 MR. DEVORE: Objection --</p> <p>2 BY THE WITNESS:</p> <p>3 A I do say -- and I think we already</p> <p>4 answered that --</p> <p>5 THE REPORTER: I'm sorry. I couldn't</p> <p>6 hear your objection, Mr. Devore.</p> <p>7 MR. DEVORE: It's asked and answered.</p> <p>8 THE WITNESS: Yeah.</p> <p>9 MR. DEVORE: It's been covered at</p> <p>10 length and it's -- you know, obviously it's</p> <p>11 duplicative, calls for speculation in</p> <p>12 certain parts as well.</p> <p>13 BY THE WITNESS:</p> <p>14 A And it's 1:58 p.m. and I'm answering</p> <p>15 the same question again, which is I provide a</p> <p>16 lot of advice and training to staff about</p> <p>17 accommodations for inmates, and I believe that</p> <p>18 I've already stated that an accommodation could</p> <p>19 include having another inmate push that</p> <p>20 wheelchair so that the officer can focus on</p> <p>21 safety and security when moving more than one</p> <p>22 inmate.</p> <p>23 BY MR. MORRISSEY:</p> <p>24 Q Did you ever train Officer Marin</p>	<p style="text-align: right;">Page 168</p> <p>1 prior. No, I don't.</p> <p>2 Q So do inmates have a choice about</p> <p>3 which path they travel when they go from the</p> <p>4 RTU to Division 4 to vote?</p> <p>5 A No. Inmates do not have a choice on</p> <p>6 how they are moved in our facility.</p> <p>7 Q Tell me why inmates do not have the</p> <p>8 choice.</p> <p>9 A Because they're in --</p> <p>10 MR. DEVORE: Objection, calls for</p> <p>11 speculation.</p> <p>12 BY THE WITNESS:</p> <p>13 A And so off topic but, yeah, they're</p> <p>14 inmates in the Department of Corrections, so</p> <p>15 they have limited rights here, Patrick.</p> <p>16 BY MR. MORRISSEY:</p> <p>17 Q And is it fair to say that inmates</p> <p>18 don't have a choice when they're leaving the</p> <p>19 RTU whether the inmate goes through the RTC</p> <p>20 east/west corridor or the north/south corridor?</p> <p>21 MR. DEVORE: Same objection.</p> <p>22 BY THE WITNESS:</p> <p>23 A Inmates have limited rights here. So</p> <p>24 do they get to dictate their path of travel to</p>
<p style="text-align: right;">Page 167</p> <p>1 about the path of travel to bring a wheelchair</p> <p>2 user from -- who's housed in the RTU over to</p> <p>3 Division 4?</p> <p>4 A No.</p> <p>5 Q Do you know whether correctional</p> <p>6 staff have been trained about the path of</p> <p>7 travel to move a wheelchair user who is housed</p> <p>8 in RTU over to Division 4 to vote?</p> <p>9 MR. DEVORE: Objection, vague, calls</p> <p>10 for speculation.</p> <p>11 BY THE WITNESS:</p> <p>12 A No, I don't know anything about that.</p> <p>13 BY MR. MORRISSEY:</p> <p>14 Q Is there -- are there accessible</p> <p>15 paths of travel to your knowledge from the RTU</p> <p>16 to Division 4 to vote?</p> <p>17 A I mean, that's a legal conclusion on</p> <p>18 whether or not a path of travel is accessible,</p> <p>19 but I do know that there are various routes to</p> <p>20 take to get into the gym of Division 4 to vote.</p> <p>21 Q And do you know about the training</p> <p>22 Officer Marin had about the paths to bring a</p> <p>23 wheelchair user from RTU to Division 4 to vote?</p> <p>24 A You just asked me that two questions</p>	<p style="text-align: right;">Page 169</p> <p>1 a destination, no.</p> <p>2 BY MR. MORRISSEY:</p> <p>3 Q Why not?</p> <p>4 A I just answered that.</p> <p>5 MR. DEVORE: Same objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A They're inmates. They have limited</p> <p>8 rights here. They don't get to dictate their</p> <p>9 path of travel.</p> <p>10 BY MR. MORRISSEY:</p> <p>11 Q Why did Officer Marin escort</p> <p>12 Mr. Westmoreland to Division 4 using the metal</p> <p>13 ramp?</p> <p>14 MR. DEVORE: Objection, speculation,</p> <p>15 assumes facts not in evidence.</p> <p>16 BY THE WITNESS:</p> <p>17 A Yeah, I don't know. I don't know.</p> <p>18 I'm not Officer Marin, so I wasn't there. So I</p> <p>19 don't know.</p> <p>20 BY MR. MORRISSEY:</p> <p>21 Q Have you ever laid eyes on that metal</p> <p>22 ramp in Division 4 that goes to the area in the</p> <p>23 lower level where people vote?</p> <p>24 A I have seen a metal ramp over a set</p>

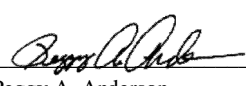

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<p>1 of stairs in the basement of Division 4 that's</p> <p>2 used to transport laundry carts and food carts.</p> <p>3 Yes, I've seen that.</p> <p>4 Q Have you ever seen inmates move or up</p> <p>5 or down that metal ramp?</p> <p>6 A Other than the video I reviewed of</p> <p>7 Westmoreland doing that on the day of the vote,</p> <p>8 no.</p> <p>9 Q Why was Mr. Westmoreland directed to</p> <p>10 go up and down that metal ramp on the day he</p> <p>11 voted?</p> <p>12 MR. DEVORE: Objection, assumes facts</p> <p>13 not in evidence, calls for speculation.</p> <p>14 BY THE WITNESS:</p> <p>15 A I already answered that. I don't</p> <p>16 know. You should ask Officer Marin why he went</p> <p>17 that way.</p> <p>18 BY MR. MORRISSEY:</p> <p>19 Q Did Officer Marin violate any policy</p> <p>20 or procedure by directing Mr. Westmoreland to</p> <p>21 traverse that metal ramp in Division 4?</p> <p>22 MR. DEVORE: Objection, calls for</p> <p>23 speculation, lack of foundation, calls for</p> <p>24 a legal conclusion, assumes facts not in</p>	<p>1 THE WITNESS: I mean, I have to go to</p> <p>2 Orland Park, so it could be an hour. It</p> <p>3 could be a little bit more. I don't know,</p> <p>4 but I will definitely pick it up as soon as</p> <p>5 I get home.</p> <p>6 MR. DEVORE: Okay.</p> <p>7 MR. MORRISSEY: Well, why don't we</p> <p>8 just continue this to a different day</p> <p>9 because I don't want to --</p> <p>10 MR. DEVORE: How much do you think</p> <p>11 you have left? I know it may be</p> <p>12 difficult to --</p> <p>13 MR. MORRISSEY: Probably about an</p> <p>14 hour, hour and a half. I think we should</p> <p>15 continue this another day because I don't</p> <p>16 want to --</p> <p>17 THE WITNESS: So we gave you 45 minutes,</p> <p>18 Patrick, but you are not going to give us</p> <p>19 one hour; is what you're saying?</p> <p>20 MR. MORRISSEY: Peggy, I assume --</p> <p>21 are we off the record?</p> <p>22 THE REPORTER: Do you want to go off</p> <p>23 the record?</p> <p>24 MR. DEVORE: Yeah, let's go off the</p>
Page 171	Page 173
<p>1 evidence, argumentative.</p> <p>2 BY THE WITNESS:</p> <p>3 A Yeah, I think you're speculating that</p> <p>4 Officer Marin directed the inmate to push</p> <p>5 Westmoreland up or down that ramp, and I'm not</p> <p>6 sure that was their path of travel on the way</p> <p>7 there because I only observed on the way back,</p> <p>8 them traversing that ramp. So I think there's</p> <p>9 a lot of assumptions you're making in that</p> <p>10 question.</p> <p>11 BY MR. MORRISSEY:</p> <p>12 Q Did you watch video showing some</p> <p>13 inmates had to get out of their wheelchairs to</p> <p>14 go down that metal ramp in Division 4?</p> <p>15 A No. No.</p> <p>16 MR. MORRISSEY: Do you need to leave</p> <p>17 now? So we can --</p> <p>18 THE WITNESS: Yeah, because you took</p> <p>19 a 30-minute break two hours into the</p> <p>20 deposition, and I have a ride that I need</p> <p>21 to take to get home because I carpooled</p> <p>22 today, so.</p> <p>23 MR. DEVORE: So what -- what time</p> <p>24 frame will we be looking at, Sabrina?</p>	<p>1 record.</p> <p>2 (WHEREUPON, a discussion</p> <p>3 off the record was held.)</p> <p>4 MR. MORRISSEY: We talked on the</p> <p>5 record and the witness has a carpool and</p> <p>6 has to leave. I prefer to finish this at a</p> <p>7 different date, given the circumstances and</p> <p>8 limitations on me and notification by the</p> <p>9 court reporter that she has commitments at</p> <p>10 a certain time today. I would prefer we</p> <p>11 just continue this next year.</p> <p>12 I raised a preference that I</p> <p>13 prefer not to do it Friday because it's the</p> <p>14 holidays, and I have some personal matters</p> <p>15 that I prefer to address. I would just</p> <p>16 like to talk to counsel about this.</p> <p>17 MR. DEVORE: Understood. And we</p> <p>18 would like to be able to try to get this</p> <p>19 done between 3:00 and 4:30 and see how much</p> <p>20 we can possibly do and if there's any</p> <p>21 mop-up, perhaps on Friday morning finish it</p> <p>22 up then but we understand counsel's -- what</p> <p>23 he said on the record.</p> <p>24 MR. MORRISSEY: All right. So we're</p>

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45 (Pages 174 to 177)

<p style="text-align: right;">Page 174</p> <p>1 going to stop the dep, and I will confer 2 with defense counsel and hopefully next 3 year we can address this, you know. 4 Thanks, everybody. And happy new year and 5 happy holidays. I'll take a copy, Peggy. 6 THE REPORTER: Mr. DeVore, do you 7 need a copy? 8 THE WITNESS: I reserve signature, 9 Jason. 10 MR. DEVORE: Yes, we would like a 11 copy. 12 THE REPORTER: Patrick, are you okay 13 with two-week delivery? 14 MR. MORRISSEY: Yeah, that's fine. 15 See you, everybody. 16 THE REPORTER: Bye. 17 (WHEREUPON, proceedings 18 were continued to January 4, 19 2024.) 20 21 22 23 24</p>	<p style="text-align: right;">Page 176</p> <p>1 STATE OF ILLINOIS) 2) ss: 3 COUNTY OF C O O K) 4 I, Peggy A. Anderson, a Certified 5 Shorthand Reporter in the State of Illinois do 6 hereby certify: 7 That previous to the commencement of 8 the examination of the witness, the witness was 9 duly sworn to testify the whole truth 10 concerning the matters herein; 11 That the foregoing deposition 12 transcript was reported stenographically by me, 13 was thereafter reduced to typewriting under my 14 personal direction, and constitutes a true 15 record of the testimony given and the 16 proceedings had; 17 That the said deposition was taken 18 before me at the time and place specified; 19 That the said deposition was 20 adjourned as stated herein; 21 That I am not a relative or employee 22 or attorney or counsel, nor a relative or 23 employee of such attorney or counsel for any of 24 the parties hereto, nor interested directly or indirectly in the outcome of this action.</p>
<p style="text-align: right;">Page 175</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 4 EUGENE WESTMORELAND,) 5 individually and for) 6 a, class) 7) 8 Plaintiff,) 9) 10 vs.) No. 1:23-cv-01851 11) 12 THOMAS DART, Sheriff of) Part 1 13 Cook County and COOK) 14 COUNTY, ILLINOIS,) 15) 16 Defendants.) 17) 18) 19) 20) 21) 22) 23) 24)</p> <p>I, SABRINA RIVERO-CANCHOLA, being first duly sworn, on oath, say that I am the deponent in the aforesaid deposition, that I have read Part I of the foregoing transcript of my deposition, consisting of pages 1-175 inclusive, taken at the aforesaid time and place and that the foregoing is a true and correct transcript of my testimony so given.</p> <p style="text-align: center;">_____ SABRINA RIVERO-CANCHOLA</p> <p>SUBSCRIBED AND SWORN TO me before this _____ day of _____, A.D. 2024. _____</p>	<p style="text-align: right;">Page 177</p> <p>1 IN WITNESS WHEREOF, I do hereunto set 2 my hand this 1st day of January, 2024. 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <div style="text-align: center;">   Peggy A. Anderson Certified Shorthand Reporter License No. 084-003813 </div>

TOOMEY REPORTING**312-853-0648**

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